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TCEQ Interoffice Memorandum

To: Central Records Files (MC – 199)
Disposal Properties LLC – San Antonio
TCEQ SWR No. 31905

Thru: Richard Scharlach, Supervisor
Corrective Action Team 3, VCP-CA Section, Remediation Division

From: Allan Posnick, Project Manager
Corrective Action Team 3, VCP-CA Section, Remediation Division

Date: 7/29/13

Subject: Documentation of achievement of GPRA facility-wide remedy selection (CA-400) and remedy construction complete (CA-550)
EPA ID No. TXD052649027
CN No. 600322796; RN No. 100622570
Permit No. 50294

Based on a file review, the selection of a final remedy is not needed for this facility. The milestone of facility-wide "No Remedy Construction Needed" (CA400)¹ has been met. This determination is based on the approval of no further action at Notice of Registration NOR Unit #24, (AKA Tank #T50) approved on October 15, 2012. Our review of the closure report for this unit indicated that no releases had been observed. The Comprehensive Site Evaluation (CEI) inspection conducted in July 2012 did not identify any current or historical releases subject to corrective action at the facility. The facility currently operates as a 10-day waste transfer facility. On-site treatment or recycling of hazardous wastes is no longer conducted. No RFI Units or AOCs subject to corrective action have been identified at this site.

Based on site characterization activities, construction of physical remedies is not needed. The milestone of facility-wide "No Remedy Construction Needed" (CA550NR)² has been met. This determination is based on the approval of no further action at NOR Unit #24, (AKA Tank #T50) on October 15, 2012. The Comprehensive Site Evaluation (CEI) inspection conducted in July 2012 did not identify any current or historical releases subject to corrective action at the facility.

No RFI Units or AOCs subject to corrective action have been identified in the permit or during inspections of this facility. Therefore, there are no units subject to the RCRA Corrective Action Program:

Table 1: RCRA Corrective Action Program

- 1) "The event when the state or EPA formally selects a remedy designed to meet RCRA Corrective Action long-term goals of protection of human health and the environment. This event code also applies when no further corrective action is required because stabilization measure(s) have already been implemented or because the site characterization has demonstrated the attainment of the long-term RCRA Corrective Action goals." See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approved remedy for this event code to apply facility-wide.
- 2) "The event when the state or EPA acknowledges in writing that the RCRA facility has completed construction of a facility's remedy that was designed to achieve long-term protection of human health and the environment, and that the remedy is fully functional as designed, whether or not final cleanup levels or other requirements have been achieved. Remedy construction may also acknowledge the event where no remedy is constructed." See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approval of the remedy construction or approval of the decision that no physical construction is needed for this event code to apply facility-wide.
- 3) Date confirmed through TCEQ correspondence review.
- 4) Date obtained from RCRAInfo database.
- 5) Date obtained from facility correspondence.
- 6) Date obtained from TCEQ database.

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DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRAInfo code (CA725)

Current Human Exposures Under Control

Facility Name: Disposal Properties, LLC
Facility Address: 4303 Profit Drive; San Antonio, TX 78219
Facility EPA ID #: TXD052649027

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

X

— If yes - check here and continue with #2 below.

— If no - re-evaluate existing data, or

— If data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be “contaminated”¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		X		See rationale below
Air (indoors) ²		X		“ ”
Surface Soil (e.g., <2 ft)		X		“ ”
Surface Water		X		“ ”
Sediment		X		“ ”
Subsurf. Soil (e.g., >2 ft)		X		“ ”
Air (outdoors)		X		“ ”

X

— If no (for all media) - skip to #6, and enter “YE” status code after providing or citing appropriate “levels”, and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

— If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

— If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

Facility Description

Disposal Properties is located at 4303 Profit Drive in San Antonio, Bexar County, Texas, and the facility has operated under several ownerships and names. The facility began operations in 1978 as the KDM Company and was purchased in 1988 and renamed Hydrocarbon Recyclers, Inc (HRI) of San Antonio, doing business as USPCI-San Antonio Facility. USPCI was acquired by Laidlaw in 1994 and became a Laidlaw-owned company effective January 1, 1995. When Laidlaw Environmental Services was acquired by Rollins Environmental Services in 1997, the name was changed to Laidlaw Environmental Services (San Antonio), Inc. In 1998, the facility changed its name to Safety-Kleen (San Antonio) after acquisition by Safety-Kleen. When Safety-Kleen Chemical Services

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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Division was acquired by Clean Harbors on September 6, 2002, the facility became a subsidiary of Clean Harbors, Inc. and the name was changed from Safety-Kleen (San Antonio) to Disposal Properties, LLC.

The facility is located on a 1.8 acres site within an industrial park, in the northeast area of San Antonio, in the area south of I-35, west of I-410, and north of I-10. The land immediately adjacent to the facility was used for warehousing and light industry. The nearest body of water to the facility is Salado Creek, located approximately one-half mile southwest of the facility. The nearest residence was approximately one-half mile to the north of the facility. A March 1999 Dames & Moore audit report indicated that the facility is surrounded by a six foot chain-link fence topped with barbed wire. Wastewaters from the site are discharged to the San Antonio Water System (SAWS), a publicly owned treatment works (POTW), under industrial wastewater permit Number MIS-0001. Drainage is to the San Antonio River in the San Antonio River Basin. (Reference 6)

Regulatory History

The facility maintains a TCEQ hazardous waste permit HW-50294 and operates under Solid Waste Registration (SWR) Number 31905. The permit has transferred with the various facility ownership and name changes via permit modifications. According to the Dames & Moore Environmental Compliance Audit mentioned above, the facility submitted its original Part A application in 1980 and a revised Part A application in July 1988, to allow expansion of the facility. The Part B application was submitted in November 1988, and several revisions to the Part A and Part B applications were submitted since that time. On March 1, 1989, a RCRA Facility Assessment (RFA) was conducted by the Texas Natural Resource Conservation Commission (TNRCC) in association with the permit review process, and found no basis for requiring further investigation. The facility's hazardous waste permit was issued on July 6, 1992, and included storage of waste in tanks and containers. The permit was issued jointly by the TNRCC and the US EPA. Since then, there have been several Class 1 and Class 2 permit modifications and partial closure activities. HRI, one of the previous operators, was primarily a solvent reclamation facility; waste solvents were received from off-site generators, stored, reclaimed, and shipped off-site for reuse. Solvent recycling at the site was discontinued on January 22, 2001, according to the Safety-Kleen facility Annual Activity Report. This was confirmed in the TNRCC February 11, 2002, CEI report which indicated that on-site disposal and recycling of hazardous waste was no longer being conducted at the facility. All waste received at the facility was being shipped off-site to other authorized facilities, while this facility was a simple transfer facility. According to a TNRCC July 30, 2002, Investigation Report, the facility at that time (Nov. 2001) was a large quantity generator (LQG), a permitted storage facility, transporter, receiver, and transfer facility.

The July 6, 1992 hazardous waste permit authorized nineteen (19) tanks, and one (1) container storage area (CSA). However, since that time the facility has proceeded with partial facility closure. The TNRCC Investigation Report February 11, 2002, indicates that the facility prepared and submitted a Closure Plan, which was modified, that received final approval by TNRCC on May 11, 1999. On July 8, 1999, TNRCC sent a letter requesting additional information about the closure and asked that the facility state under which Risk Reduction standards these units were being closed. TNRCC stated in the letter that for closure to background, Risk Reduction Standard No. 1 (RRS1) was applicable. On September 28, 1999, TCEQ issued a letter stating that the Closure Certification Report and subsequent additional TCEQ-requested information had been reviewed, and that TCEQ accepted that the closure of the 19 tanks was completed in accordance with the Texas Risk Reduction Rules, and that the closure certification acceptance did not include tank T-1 or the container storage area. Information in the facility's July 26, 1999, letter appears to be consistent with the RCRAInfo Comprehensive Permitting Report run on December 22, 2005, which indicates that the 19 permitted tanks were "clean closed" effective September 28, 1999. After TCEQ acceptance of the partial closure, on December 6, 1999, the Safety-Kleen facility submitted a Class 2 permit modification to TCEQ. The purpose of the modification was to delete units 2 to 19 and unit 21 while tank T-1 (unit 1) and the container storage area (unit 20) would remain active. The TNRCC November 6, 2001, Notice of Registration (NOR) (Attachment 1 of the CEI report) indicated that one tank (T-1) and the container storage area were still active and classified as RCRA permitted.

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The TRNCC February 11, 2002, CEI report indicated that the Safety-Kleen facility at the time of the CEI was an industrial large quantity generator. However, a Safety-Kleen January 8, 2002, letter updating the Notice of Registration (NOR) indicated that the facility status was a Small Quantity Generator (SQG). Mr. Craig Meppen, of TCEQ San Antonio Regional Office 13, was contacted to clarify this issue. According to Mr. Meppen the facility is a SQG and has one permitted CSA and one permitted tank. He indicated that the facility has not been inspected since approximately 2004, but was scheduled to be inspected this year. He indicated there are no compliance issues of which he is aware (Reference 15).

Additionally, the February 11, 2002, TNRCC Notice of Violation (NOV) letter Summary mentioned resolved areas of concern from a 1999 investigation. It was observed that the potential for soil contamination from overspraying during pressure washing decontamination activities existed based on lack of a curb during partial closure activities. The facility satisfactorily resolved this issue and stated that the Container Storage Area (CSA) would be addressed upon full facility closure. Likewise, an area of possibly impacted asphalt and soil from an alleged spill of less than a quart of trichloroethylene (less than a reportable quantity) would also be incorporated in the final closure plan when the CSA is closed.

On March 18, 2004, TCEQ issued the permit renewal for HW-50294-001 to Disposal Properties contained in the permit, is the statement that no units require a RCRA Facility Investigation (RFI). The permit authorizes management of waste in, Tank T-1 (Unit 001) and Container Storage Area (Unit 020). The U.S. EPA Region 6 sent a letter (received on July 22, 2004, by the State) to Clean Harbors issuing the federal portion for the Joint RCRA Permit with both State and Federal Provisions for the facility.

Mr. Meppen, indicated that there are no ongoing related corrective actions or unresolved past violations. Since the 2004 permit renewal indicated that no units required a RFI at the time of renewal, it is assumed that the two remaining currently permitted units were operating within the parameters of the permit at that time.

Rationale

There is no history of significant release to any environmental media or non-compliance at this facility documented in available file materials. A RCRA Facility Assessment was performed by the TNRCC in March 1989 and found no further action was required. The facility operates under a hazardous waste permit, with routine inspections and third party audits conducted. Nineteen of the 21 permitted units were clean closed. The facility has a perimeter security fence preventing trespassers.

References

1. TNRCC Interoffice Memorandum from Geoffrey Meyer to File; Regarding Incorrect Routing of Safety Kleen Closure Certification Report to Corrective Action Section Instead of the IHW Permits Section; April 16, 2001.
2. Letter from William Hallam, Safety-Kleen, to TNRCC; Update of Notice of Registration; January 8, 2002.
3. Letter Report from Henry Karnei, TNRCC, to Mike Sanderock, Safety-Kleen of San Antonio; Regarding Notice of Violation for the RCRA Compliance Evaluation Inspection conducted November 14 and 30, Summary of Investigation Findings enclosed; February 11, 2002.
4. TNRCC Investigation Report for Compliance Evaluation Inspection conducted November 14 and 30, 2001; with attachments, including HW Permit Number HW-50294-001 issued March 11, 1994, to Hydrocarbon Recyclers; February 11, 2002.
5. Letter from TNRCC to Gary Burns, Safety-Kleen; Regarding Technical Notice of Deficiency; May 31, 2002.

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6. TNRCC Investigation Report; Non-financial Record Review Investigation (NRR) conducted July 30, 2002; Follow-up to CEI conducted November 14 and 30, 2001; with two attachments including facility February 21, 2002, letter to TNRCC enclosing Environmental Compliance Audit Safety-Kleen (San Antonio), Inc. prepared by Dames & Moore March 26, 1999 ; July 30, 2002.
7. Letter from Henry Karnei, TNRCC, to Mike Sanderock, Safety-Kleen of San Antonio; Regarding Non-financial Record Review Investigation; July 30, 2002.
8. Letter from Katherine Nelson, TCEQ, to Gary Burns, Disposal Properties; Regarding Transmittal of Initial Draft Permit Renewal; February 27, 2003.
9. Letter from Katherine Nelson, TCEQ, to Darrin Swartz-Larson, US EPA; Regarding Transmittal of Initial Draft Permit Renewal for Disposal Properties; February 27, 2003.
10. Letter from Katherine Nelson, TCEQ, to Lan Stewart, Disposal Properties; Regarding Transmittal of Final Draft Permit Renewal; June 16, 2003.
11. Letter from Wade Wheatley, TCEQ, to Lan Stewart, Disposal Properties; Regarding Transmittal of Permit Renewal; HW Permit Number HW-50294-001 issued March 18, 2004 attached to letter; March 23, 2004.
12. Letter from Carl Edlund, U.S. EPA, to David Taylor, Clean Harbors; Regarding Joint Permit wit both State and Federal Provisions for Disposal Properties; received by TCEQ July 22, 2004.
13. RCRAInfo EPA Comprehensive Permitting Report run on December 22, 2005.
14. RCRAInfo EPA Comprehensive Corrective Action Report run on December 28, 2005.
15. Communication Log; Telephone Conversation with June Dreith, TechLaw, Inc. and Craig Meppen, TCEQ; Regarding facility status; dated June 23, 2006.

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3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

“Contaminated” Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors’ spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“___”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

___ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

___ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

___ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

—— If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

—— If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

—— If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

⁴ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

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5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

- If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
- If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.
- If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):

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- YE YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Disposal Properties LLC facility, EPA ID # TXD05249027, located at 4303 Profit Drive; San Antonio TX 78219 under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
- NO NO - "Current Human Exposures" are NOT "Under Control."
- IN IN - More information is needed to make a determination.

Completed by (signature) _____ Date _____
 (print) _____
 (title) _____

Researched by	(signature) <i>Maxine LaPierre</i>	Date	April 25, 2006
	(print) Maxine La Pierre		
	(title) TechLaw, Inc. (U.S. EPA Contractor)		
	(EPA Region or State)		

Supervisor (signature) _____ Date _____
 (print) _____
 (title) _____

Locations where References may be found:
Texas Commission on Environmental Quality
File Room; Building E
12118 North I-35
Austin, TX 78753

Filed under:
SWR # 31905

Contact telephone and e-mail numbers

(name) _____
(phone #) _____
(e-mail) _____

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

Recommended Further Actions: None



RCRA Tech

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

February 16, 2015

MEMORANDUM

SUBJECT: Documentation of Achievement of GPRA Facility-wide Corrective Action Complete (CA999RM)

FROM: David Vogler, Geologist *[Signature]* 2/16/15
RCRA State and Tribal Oversight Section (6PD-O)

THRU: Randall Rush, Section Chief *[Signature]* 3/13/15
RCRA State and Tribal Oversight Section (6PD-O)

TO: RCRA Technical Files

RE: Disposal Properties, LLC (TXD052649027) ✓
San Antonio, Texas 78219

Based on review of all available relevant information on known or reasonably suspected releases to soil, groundwater, surface soil, sediments, and air, subject to RCRA Corrective Action, *e.g.* from Solid Waste Management Units (SWMUs), Regulated Units (RUs), and Areas of Concern (AOCs), the following determination has been made:

Corrective Action Process Terminated – Remedial Activities Complete: The corrective action process for the entire facility has been completed; the active remedial measures, as specified in the RCRA permit, enforcement order, or other mechanism are completed for the entire facility (CA999RM).

This determination is made 1) after the Certification of Remedy Completion or Construction Completion (CA550) and/or 2) after stabilization measure(s) has been completed in a manner that meets the stabilization objectives, goals, performance standards, and/or desired results (CA650), and terminating corrective action, at this point, at the facility, would satisfy all permit, order, or other mechanism requirements for corrective action.

There is no history of significant releases to any environmental media or non-compliance at this facility documented in available file materials. A RCRA Facility Assessment was performed by the TNRCC in March 1989, and found that no further action was required. The facility operates under a hazardous waste permit, with routine inspections and third party audits conducted. Nineteen of the 21 permitted units were clean closed, and the other two are operating regulated units (one tank and one container storage).

This determination is protective of human health and the environment. It completes the RCRA corrective action process under HSWA, at this time. In some instances, performance of required operation and maintenance and monitoring actions and/or maintenance of institutional controls may be ongoing, consistent with EPA's February 2003 document, *Final Guidance on Completion of Corrective Action Activities at RCRA Facilities* (68 FR 8757). This determination will be re-evaluated if the regulatory agencies or the facility become aware of significant information regarding the facility, which would change the conditions. The facility must continue to comply with all applicable parts of RCRA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

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2/12/15
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February 16, 2015

MEMORANDUM

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FROM: David Vogler, Geologist *[Signature]* 2/16/15
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THRU: Randall Rush, Section Chief *[Signature]* 3/3/15
RCRA State and Tribal Oversight Section (6PD-O)

TO: RCRA Technical Files

RE: Disposal Properties, LLC (TXD052649027)
San Antonio, Texas 78219

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Concurrence Sheet
Environmental Indicators
725/750 Verification Forms
2020 Baseline Facilities

Facility Name: Disposal Properties, LLC

EPA ID. No.: TXD052649027

Section: 6PD-C

EPA Reviewer: _____

Forms (s) Reviewed ☒ CA725 ☐ CA750

Name	Action	Signature	Date
David Vogler	Receive/Log		
Nick Stone	Distribute	T. Wright	03/16/2012
Reviewer	Review/comment		
Reviewer	Revise as needed		
Terrie Wright	Copy to 10 th Floor file	T. Wright	
Terrie Wright	Scan revised original	T. Wright	
Tim Fryer	Upload to internet & change internet table		
Terrie Wright	File sheet and original forms in 6PD-O file	T. Wright	

Flip over for instructions

725/750 Review Process

1. The Reviewer will review and concur on completed forms. Concurrence consists of the Reviewer's initials on the signature page. Incomplete forms will be discussed between the Reviewer and the appropriate Technical State Oversight coordinator (i.e. Fagan, Stone, and Vogler). Issues will be resolved and the Reviewer will concur. The Reviewer passes the form(s) to Terrie Wright.
2. Terrie Wright will copy the forms and send the copy to the Technical File in the 10th Floor file room. Terrie Wright will scan the form and create an electronic file and original hard copy with concurrence sheet to Tim Fryer.
3. Tim Fryer will upload the electronic form onto the Regional webpage for the RCRA baseline and change internet link table.
4. After internet link table is updated, Tim will pass the paperwork to Terrie to file in 6PD-O file

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Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRAInfo code (CA725)

Current Human Exposures Under Control

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Facility EPA ID #:	TXD052649027

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☒ X

_____ If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

_____ If data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

Current Human Exposures Under Control
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2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be “contaminated”¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		X		See rationale below
Air (indoors) ²		X		“ ”
Surface Soil (e.g., <2 ft)		X		“ ”
Surface Water		X		“ ”
Sediment		X		“ ”
Subsurf. Soil (e.g., >2 ft)		X		“ ”
Air (outdoors)		X		“ ”

X

— If no (for all media) - skip to #6, and enter “YE” status code after providing or citing appropriate “levels”, and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

— If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

— If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

Facility Description

Disposal Properties is located at 4303 Profit Drive in San Antonio, Bexar County, Texas, and the facility has operated under several ownerships and names. The facility began operations in 1978 as the KDM Company and was purchased in 1988 and renamed Hydrocarbon Recyclers, Inc (HRI) of San Antonio, doing business as USPCI-San Antonio Facility. USPCI was acquired by Laidlaw in 1994 and became a Laidlaw-owned company effective January 1, 1995. When Laidlaw Environmental Services was acquired by Rollins Environmental Services in 1997, the name was changed to Laidlaw Environmental Services (San Antonio), Inc. In 1998, the facility changed its name to Safety-Kleen (San Antonio) after acquisition by Safety-Kleen. When Safety-Kleen Chemical Services

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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Division was acquired by Clean Harbors on September 6, 2002, the facility became a subsidiary of Clean Harbors, Inc. and the name was changed from Safety-Kleen (San Antonio) to Disposal Properties, LLC.

The facility is located on a 1.8 acres site within an industrial park, in the northeast area of San Antonio, in the area south of I-35, west of I-410, and north of I-10. The land immediately adjacent to the facility was used for warehousing and light industry. The nearest body of water to the facility is Salado Creek, located approximately one-half mile southwest of the facility. The nearest residence was approximately one-half mile to the north of the facility. A March 1999 Dames & Moore audit report indicated that the facility is surrounded by a six foot chain-link fence topped with barbed wire. Wastewaters from the site are discharged to the San Antonio Water System (SAWS), a publicly owned treatment works (POTW), under industrial wastewater permit Number MIS-0001. Drainage is to the San Antonio River in the San Antonio River Basin. (Reference 6)

Regulatory History

The facility maintains a TCEQ hazardous waste permit HW-50294 and operates under Solid Waste Registration (SWR) Number 31905. The permit has transferred with the various facility ownership and name changes via permit modifications. According to the Dames & Moore Environmental Compliance Audit mentioned above, the facility submitted its original Part A application in 1980 and a revised Part A application in July 1988, to allow expansion of the facility. The Part B application was submitted in November 1988, and several revisions to the Part A and Part B applications were submitted since that time. On March 1, 1989, a RCRA Facility Assessment (RFA) was conducted by the Texas Natural Resource Conservation Commission (TNRCC) in association with the permit review process, and found no basis for requiring further investigation. The facility's hazardous waste permit was issued on July 6, 1992, and included storage of waste in tanks and containers. The permit was issued jointly by the TNRCC and the US EPA. Since then, there have been several Class 1 and Class 2 permit modifications and partial closure activities. HRI, one of the previous operators, was primarily a solvent reclamation facility; waste solvents were received from off-site generators, stored, reclaimed, and shipped off-site for reuse. Solvent recycling at the site was discontinued on January 22, 2001, according to the Safety-Kleen facility Annual Activity Report. This was confirmed in the TNRCC February 11, 2002, CEI report which indicated that on-site disposal and recycling of hazardous waste was no longer being conducted at the facility. All waste received at the facility was being shipped off-site to other authorized facilities, while this facility was a simple transfer facility. According to a TNRCC July 30, 2002, Investigation Report, the facility at that time (Nov. 2001) was a large quantity generator (LQG), a permitted storage facility, transporter, receiver, and transfer facility.

The July 6, 1992 hazardous waste permit authorized nineteen (19) tanks, and one (1) container storage area (CSA). However, since that time the facility has proceeded with partial facility closure. The TNRCC Investigation Report February 11, 2002, indicates that the facility prepared and submitted a Closure Plan, which was modified, that received final approval by TNRCC on May 11, 1999. On July 8, 1999, TNRCC sent a letter requesting additional information about the closure and asked that the facility state under which Risk Reduction standards these units were being closed. TNRCC stated in the letter that for closure to background, Risk Reduction Standard No. 1 (RRS1) was applicable. On September 28, 1999, TCEQ issued a letter stating that the Closure Certification Report and subsequent additional TCEQ-requested information had been reviewed, and that TCEQ accepted that the closure of the 19 tanks was completed in accordance with the Texas Risk Reduction Rules, and that the closure certification acceptance did not include tank T-1 or the container storage area. Information in the facility's July 26, 1999, letter appears to be consistent with the RCRAInfo Comprehensive Permitting Report run on December 22, 2005, which indicates that the 19 permitted tanks were "clean closed" effective September 28, 1999. After TCEQ acceptance of the partial closure, on December 6, 1999, the Safety-Kleen facility submitted a Class 2 permit modification to TCEQ. The purpose of the modification was to delete units 2 to 19 and unit 21 while tank T-1 (unit 1) and the container storage area (unit 20) would remain active. The TNRCC November 6, 2001, Notice of Registration (NOR) (Attachment 1 of the CEI report) indicated that one tank (T-1) and the container storage area were still active and classified as RCRA permitted.

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The TRNCC February 11, 2002, CEI report indicated that the Safety-Kleen facility at the time of the CEI was an industrial large quantity generator. However, a Safety-Kleen January 8, 2002, letter updating the Notice of Registration (NOR) indicated that the facility status was a Small Quantity Generator (SQG). Mr. Craig Meppen, of TCEQ San Antonio Regional Office 13, was contacted to clarify this issue. According to Mr. Meppen the facility is a SQG and has one permitted CSA and one permitted tank. He indicated that the facility has not been inspected since approximately 2004, but was scheduled to be inspected this year. He indicated there are no compliance issues of which he is aware (Reference 15).

Additionally, the February 11, 2002, TNRCC Notice of Violation (NOV) letter Summary mentioned resolved areas of concern from a 1999 investigation. It was observed that the potential for soil contamination from overspraying during pressure washing decontamination activities existed based on lack of a curb during partial closure activities. The facility satisfactorily resolved this issue and stated that the Container Storage Area (CSA) would be addressed upon full facility closure. Likewise, an area of possibly impacted asphalt and soil from an alleged spill of less than a quart of trichloroethylene (less than a reportable quantity) would also be incorporated in the final closure plan when the CSA is closed.

On March 18, 2004, TCEQ issued the permit renewal for HW-50294-001 to Disposal Properties contained in the permit, is the statement that no units require a RCRA Facility Investigation (RFI). The permit authorizes management of waste in, Tank T-1 (Unit 001) and Container Storage Area (Unit 020). The U.S. EPA Region 6 sent a letter (received on July 22, 2004, by the State) to Clean Harbors issuing the federal portion for the Joint RCRA Permit with both State and Federal Provisions for the facility.

Mr. Meppen, indicated that there are no ongoing related corrective actions or unresolved past violations. Since the 2004 permit renewal indicated that no units required a RFI at the time of renewal, it is assumed that the two remaining currently permitted units were operating within the parameters of the permit at that time.

Rationale

There is no history of significant release to any environmental media or non-compliance at this facility documented in available file materials. A RCRA Facility Assessment was performed by the TNRCC in March 1989 and found no further action was required. The facility operates under a hazardous waste permit, with routine inspections and third party audits conducted. Nineteen of the 21 permitted units were clean closed. The facility has a perimeter security fence preventing trespassers.

References

1. TNRCC Interoffice Memorandum from Geoffrey Meyer to File; Regarding Incorrect Routing of Safety Kleen Closure Certification Report to Corrective Action Section Instead of the IHW Permits Section; April 16, 2001.
2. Letter from William Hallam, Safety-Kleen, to TNRCC; Update of Notice of Registration; January 8, 2002.
3. Letter Report from Henry Karnei, TNRCC, to Mike Sanderock, Safety-Kleen of San Antonio; Regarding Notice of Violation for the RCRA Compliance Evaluation Inspection conducted November 14 and 30, Summary of Investigation Findings enclosed; February 11, 2002.
4. TNRCC Investigation Report for Compliance Evaluation Inspection conducted November 14 and 30, 2001; with attachments, including HW Permit Number HW-50294-001 issued March 11, 1994, to Hydrocarbon Recyclers; February 11, 2002.
5. Letter from TNRCC to Gary Burns, Safety-Kleen; Regarding Technical Notice of Deficiency; May 31, 2002.

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6. TNRCC Investigation Report; Non-financial Record Review Investigation (NRR) conducted July 30, 2002; Follow-up to CEI conducted November 14 and 30, 2001; with two attachments including facility February 21, 2002, letter to TNRCC enclosing Environmental Compliance Audit Safety-Kleen (San Antonio), Inc. prepared by Dames & Moore March 26, 1999 ; July 30, 2002.
7. Letter from Henry Karnei, TNRCC, to Mike Sanderock, Safety-Kleen of San Antonio; Regarding Non-financial Record Review Investigation; July 30, 2002.
8. Letter from Katherine Nelson, TCEQ, to Gary Burns, Disposal Properties; Regarding Transmittal of Initial Draft Permit Renewal; February 27, 2003.
9. Letter from Katherine Nelson, TCEQ, to Darrin Swartz-Larson, US EPA; Regarding Transmittal of Initial Draft Permit Renewal for Disposal Properties; February 27, 2003.
10. Letter from Katherine Nelson, TCEQ, to Lan Stewart, Disposal Properties; Regarding Transmittal of Final Draft Permit Renewal; June 16, 2003.
11. Letter from Wade Wheatley, TCEQ, to Lan Stewart, Disposal Properties; Regarding Transmittal of Permit Renewal; HW Permit Number HW-50294-001 issued March 18, 2004 attached to letter; March 23, 2004.
12. Letter from Carl Edlund, U.S. EPA, to David Taylor, Clean Harbors; Regarding Joint Permit wit both State and Federal Provisions for Disposal Properties; received by TCEQ July 22, 2004.
13. RCRAInfo EPA Comprehensive Permitting Report run on December 22, 2005.
14. RCRAInfo EPA Comprehensive Corrective Action Report run on December 28, 2005.
15. Communication Log; Telephone Conversation with June Dreith, TechLaw, Inc. and Craig Meppen, TCEQ; Regarding facility status; dated June 23, 2006.

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3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential Human Receptors (Under Current Conditions)

<u>“Contaminated” Media</u>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors[] spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“___”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

___ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

___ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

___ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

—— If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

—— If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

—— If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s):

⁴ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

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5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?

- If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
- If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.
- If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code

Rationale and Reference(s):

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- YE YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Disposal Properties LLC facility, EPA ID # TXD05249027, located at 4303 Profit Drive; San Antonio TX 78219 under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
- NO NO - "Current Human Exposures" are NOT "Under Control."
- IN IN - More information is needed to make a determination.

Completed by (signature) ANHUUAI PHAM Date 12/01/08
(print) ANHUUAI PHAM
(title) CHEMIST

Researched by	(signature) <i>Maxine La Pierre</i>	Date	April 25, 2006
	(print) Maxine La Pierre		
	(title) TechLaw, Inc. (U.S. EPA Contractor)		
	(EPA Region or State)		

Supervisor (signature) Catherine Carter Date September 30, 2010
(print) Catherine Carter
(title) Chief of PD-MI EPA R6

Locations where References may be found:
Texas Commission on Environmental Quality
File Room; Building E
12118 North I-35
Austin, TX 78753

Filed under:
SWR # 31905

Contact telephone and e-mail numbers

(name) _____
(phone #) _____
(e-mail) _____

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

Recommended Further Actions: None

AKA Hydrocarbon Recyclers, Landlaw Environmental Svcs
Facility Name: Disposal Properties, LLC EPA ID: TXD052649027 TCEQ SW: 3905 also TCEQ Co.
Location: 4303 Probst Drive Lat/Long: 29°26'33" N / 98°24'33" W
San Antonio, TX 78219
Owner/Operator: Disposal Properties, LLC Operating Status: Active/Inactive references to Permit No. 50294
Current Regulatory Status (LQG/SQG/Generator only) TSD Site Constructed or not Explain: - copied this permit
LQG Generator, Transporter for Hinc Resource Transfer Facility

Permitting Data:

RCRA Operating Permit: Yes/No Date: 3/11/91 + 17/6/92

Do any units have a Post Closure Permit? List and date:

information concerning joint
TCEQ/EPA permit in file - 4 p.
- copied all 4 pages 18

Permit Renewal Status:

Permit Renewal application date: 3/19/03

Permit Renewal date: 3/18/04 - Permit # HW-50294-001

Regulated Units in Permit

Regulated Unit	Status	Dates of Action
<u>copied portions of 1992 Permit + 2001 renewal</u>		
<u>that lists units</u>		
<u>2 add'l units added in 5/10/93</u>		
<u>copied undated Part B Permit App</u>		
<u>copied undated Land Disposal Restriction Checklist</u>		
<u>9/21/95 - Closure of</u>	<u>approx 23 tanks approved</u>	<u>by TNRCC</u>

Corrective Action:

RFA/Date: _____ RFA Available? _____ Compliance Plan/Date: _____

Most Recent CA Report/Date: _____

Other CA Reports: _____

SWMUs in Corrective Action/status either in Permit or Compliance Plan or "other" such as voluntary.

SWMUs	Status	Dates of Action
<u>None listed in 3/18/04 Renewal Permit</u>		

Has this facility been referred to another authority other than RCRA? If so, specify authority/date:

Voluntary program: _____

State SF: _____

EPA SF: _____

State EN: _____

EPA EN: _____

Does this facility require an inspection? 7/2-8/97

Other Notes: Inspection 4/16-17/96, 7/22-24/96

Most recent inspection 11/14 + 11/30/01

- copied Investigation Report 19

Also reviewed file for 50294

- 1 Copied 3 p. Ind. + Haz. Waste Δ Form - 6/25/98
several Class 1 Permit Mods. (minor changes), also a couple of Class 2 Permit Mods.
 - 2 copied 9/21/95 Closure Certification Acceptance of 24 tanks
copied p. 1, 3, 5, 7 of TNRCC Permit dated 3/11/94
- MISSING even-numbered pages
 - 3 copied p. 1-7 of TNRCC Permit dated 7/6/92
- including list of authorized facility units (p. 4-6)
 - 4 copied 2 p. Compliance Summary - 8/2/91
wanted to add transfer facility in 1996 - no correspondence from TCEQ w/ approval
11/20/95 - Class 2 Mod. application - change to Waste Analysis Plan
 - 5 Copy of Ind. Haz. Waste Part B Permit App. - undated
- lists facility units
 - 6 5/10/93 letter from USPCI - identification of 2 add'l units
- copied 3 p.
 - 7 7/19/89 letter from TX Water Commission - approval of closure plans
- copied - 2 p.
 - 8 Partial Closure Plan - undated
- copied Table 1 - Tank List (2 p.)
-
- 9 TNRCC Notice of Application for an Amendment to a Commercial Industrial Haz. Waste Storage + Processing Facility Permit
- ~~copied~~ Copied (2 p.)
 - 10 Land Disposal Restriction Checklist (undated)
- Tanks Table copied (1 p.)
 - 11 Permitted Tanks Checklist (undated)
- copied Tanks Table (2 p.)
 - 12 TCEQ Introductory Memo dated 1/27/93
- attached is Notice of Registration dated 4/6/92 (COPIED 5 p.)
- lists on-site waste management facilities
 - 13 Haz. Waste Inspection Report (7/2-8/97) - copied p. 1-6
- copied 2 page Tanks Table
 - 14 3/11/94 Permit - copied odd- and even-numbered pages (1-7 even pages not available in previous copy of Permit)

Other Notes:

- 5 10/21/96 USPCI Letter RE Amendment to NOR - copied (3 p.)
 - also copied attached table w/ charges to WMUs
- 6 1/20-28/98 Compliance Evaluation Investigation (CEI)
 - copied 12^{1/2} pages
- 7 3/18/04 permit renewal
 - copied applicable portions of permit (dealing w/ authorized facility units)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

RECEIVED
TNRCC IHW PERMITS

JUL 22 2004

WASTE PERMITS DIVISION

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. David Taylor
Compliance Manager
Clean Harbors
500 Battleground Road
La Porte, Texas 77571

RE: Joint RCRA Permit with both State and Federal Provisions for Disposal Properties, LLC., San Antonio, Texas, EPA Identification Number TXD052649027.

Dear Mr. Taylor:

On March 18, 2004, the Texas Commission on Environmental Quality (TCEQ) issued a final permit to your facility for hazardous waste processing and storage. All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of HSWA for which the TCEQ has not been authorized. Your permit included some waste codes for which TCEQ is not yet authorized to implement. Therefore, in order to have a fully effective permit renewal, the U.S. Environmental Protection Agency (EPA) must jointly issue an approval of this permit.

Based on the information provided and our understanding that no adverse public comments were received regarding the Federal provisions, EPA grants you the authority to manage the waste codes as stated in the permit, without any changes to the management practices of your previously permitted storage units. Please find enclosed a signature page that is a part of the joint permit. It should be noted that the renewal date will remain the same as the state issued portion of your permit.

In 40 CFR Part 124.19, the procedures for requesting that the EPA Administrator review permit decisions is described. Effective March 1, 1992, EPA changed jurisdiction over petitions for review from the Administrator to the Environmental Appeals Board. If you petition the Environmental Appeals Board for such a review, please send a copy of your petition to the Region 6 office.

DUE DATE DOC # 100537

WWC# 10692784

PM B. L. L. L.

TEAM ☐ 1 ☐ 2 ☐ UIC

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)

INDUSTRIAL and HAZARDOUS WASTE CHANGE FORM

This form is to be used by a Facility Representative and or a TNRC Investigator to request a change be made in the information in the TNRC and EPA databases (TRACS and RCIS)

31905
R. PIVET

JUN 24 1998

SAN ANTONIO

Current Site Information - SECTION I must be complete for this form to be valid. Please write "N/A" in boxes that do not apply in Section I.

7/31/98
in

SECTION I:

TNRC Registration Number: SWR No. 31905	F Number: Not applicable	EPA ID Number TXD 052649027
Current Company Name: Laidlaw Environmental Services (San Antonio), Inc.	Current Facility Name Laidlaw Environmental Services (San Antonio), Inc	
TNRC Region #: 13	County: Bexar	
Complete Site Address: 4303 Profit Drive San Antonio, Texas 78219		
Contact Person: Michael Sanderuck Telephone Number (include area code) (210) 304-3000		
Facility Type (circle all that apply): <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Transporter for Hire Self (Circle) (TRP) <input type="checkbox"/> Receiver <input type="checkbox"/> Treatability Study (Hazardous waste only) <input type="checkbox"/> Landfill <input type="checkbox"/> Class 1 <input type="checkbox"/> Class 2 <input type="checkbox"/> Class 3 <input type="checkbox"/> Hazardous <input type="checkbox"/> Municipal Nonindustrial <input type="checkbox"/> Recycler <input type="checkbox"/> Hazardous <input type="checkbox"/> Class 1 <input type="checkbox"/> Other <input type="checkbox"/> Treatment <input checked="" type="checkbox"/> Storage <input type="checkbox"/> Injection Well <input type="checkbox"/> Incineration <input checked="" type="checkbox"/> Recovery <input type="checkbox"/> Energy <input type="checkbox"/> Metals <input checked="" type="checkbox"/> Solvents <input type="checkbox"/> Other <input type="checkbox"/> Other disposal <input checked="" type="checkbox"/> Transfer Facility		Generator Type (circle all that apply): <input checked="" type="checkbox"/> Industrial <input type="checkbox"/> Nonindustrial <input type="checkbox"/> Municipal <input type="checkbox"/> Railroad Commission Jurisdiction
Facility is currently registered as (circle all that apply): <input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) <input type="checkbox"/> No Hazardous Waste (NHW) - Generates more than 100kg/220 lbs monthly of Class 1 industrial waste but no hazardous waste		

RECEIVED

JUL 30 1998

DM&T

WAF 7/30

U

Requested Changes - SECTION II - VII: It is only necessary to fill out the section(s) for which you are requesting changes.

SECTION II: Registration Number Needed: (complete if applicable)

Facility is required by rule to register with (Circle all that apply):
TNRCC
EPA

Facility is not required by rule to register but needs a Field Operations Identification Number (Circle below)
F Number needed

SECTION III: Company Name Change: (complete if applicable)

Name is being changed to: Safety-Kleen (San Antonio), Inc.

Reason for name change: Unified corporate name

SECTION IV: Site Name Change: (complete if applicable)

Name is being changed to: Safety-Kleen (San Antonio), Inc.

Reason for name change: Unified corporate name

SECTION V: Mailing Address Change: (complete if applicable)

New and complete mailing address:

SECTION VI: Contact Person and/or Telephone Number Change: (complete if applicable)

New contact person:
Title:

Telephone number (include area code) of new contact person:

31905




SECTION VII: Generator Status/Facility Type Change (complete if applicable)

Facility Type (circle all that apply): <input checked="" type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter for Hire Self (Circle) (TRP) <input checked="" type="checkbox"/> Receiver: <input type="checkbox"/> Treatability Study (Hazardous waste only) <input type="checkbox"/> Landfill <input type="checkbox"/> Class 1 <input type="checkbox"/> Class 2 <input type="checkbox"/> Class 3 <input type="checkbox"/> Hazardous <input type="checkbox"/> Municipal/Nonindustrial <input checked="" type="checkbox"/> Recycler <input checked="" type="checkbox"/> Hazardous <input checked="" type="checkbox"/> Class 1 <input type="checkbox"/> Other <input type="checkbox"/> Treatment <input checked="" type="checkbox"/> Storage <input type="checkbox"/> Injection Well <input type="checkbox"/> Incineration <input checked="" type="checkbox"/> Recovery <input type="checkbox"/> Energy <input type="checkbox"/> Metals <input checked="" type="checkbox"/> Solvents <input type="checkbox"/> Other <input type="checkbox"/> Other disposal <input checked="" type="checkbox"/> Transfer Facility	Generator Type (circle all that apply): Industrial Nonindustrial Municipal Railroad Commission Jurisdiction
---	--

Generator/Facility Status (circle all that apply):
 Large Quantity Generator (LQG)
 Small Quantity Generator (SQG)
 Conditionally Exempt Small Quantity Generator (CESQG)
 No Hazardous Waste Generator (NHW) (Generates more than 100kg/220 lbs monthly of Class 1 industrial waste but no hazardous waste)
 Inactive (no waste of any kind is being generated but may have hazardous or non-hazardous waste left on-site)
 Non-Handler (an active site that does not generate hazardous waste and does not generate more than 100kg/220 lbs monthly of Class 1 Industrial waste)
 Abandoned (no identifiable responsible party for the site)
☒ Closed RCRA Unit(s) RCRA Permit Number(s) 18 and 19

SECTION VIII: Additional Comments: (Optional)

SECTION IX: Signature Block: (must be signed by TNRCC Investigator and/or Facility Representative for this form to be considered valid):

 (Signature of TNRCC Investigator)	 (Date)
 (Signature of Facility Representative)	<u>June 25, 1998</u> (Date)

Facility Representatives should send this form to:
 The Texas Natural Resource Conservation Commission
 The Industrial and Hazardous Division/Waste Evaluation Section
 P.O. Box 13087/MC-129, Austin, Texas 78753

9197 TRR

Barry R. McBee, *Chairman*
 R. B. "Ralph" Marquez, *Commissioner*
 John M. Baker, *Commissioner*
 Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution RECEIVED OCT 0 1995

September 21, 1995

Mr. Phil Gover
 Facility Manager
 USPCI
 4303 Profit Drive
 San Antonio, Texas 78219

RECEIVED OCT 0 1995

Re: Hydrocarbon Recyclers, Inc. of San Antonio dba USPCI
 TNRCC Solid Waste Registration No. 31905
 TNRCC Permit No. 50294, EPA ID No. TXD052649027
 24 Hazardous Waste Storage Tanks: Nos. 3, 4, 8, 10, 11, 12,
 13, 14, 23, 24, 25, 26, 27, 28, 29, 30, 33, 34, 35 and
 five unnumbered 300 gal. tanks
 Interim-Status Hazardous Waste Units
 Closure Certification Acceptance

Dear Mr. Gover:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed your letter dated August 21, 1995 stating that closure activity for the referenced tanks has been completed. It is our understanding that tanks numbered 8, 10, 11, 12, 13, 14, 24, 25, 26, 27, 28, 29, 30, 33, 34 and 35 were sandblasted to a "white metal preparation" and certified by W.E. Simpson Company. It is also our understanding that tanks numbered 3, 4, 23 and five 300 gallon unnumbered tanks were cleaned and the rinsate was tested and showed no contamination. There was some confusion about the numbering system for the second group of tanks. Also, some of the tank testing occurred prior to the closure plan approval date of July 19, 1989. Apparently, after a meeting held in Austin on June 8, 1988 to review the proposed closure plan, KDM Company (predecessor to Hydrocarbon Recyclers, Inc.) assumed that it could begin closure activities before the closure plan was formally approved by the Texas Water Commission (predecessor to the TNRCC).

Our review and discussions with the TNRCC Region 13 inspectors indicate that the closure was conducted essentially in accordance with the approved closure plan, although some closure activities were initiated prior to the written approval. The TNRCC hereby accepts the closure certification. Your facility will no longer be required to maintain hazardous waste financial assurance for the closed units, in accordance with 40 CFR 265.143(h).

Mr. Gover

Page 2

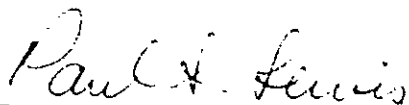
September 21, 1995

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by Title 30 Texas Administrative Code (TAC) §335.4. If the actual closure fails to comply with these requirements, the burden remains upon USPCI to take any necessary and authorized action to correct such conditions.

The provisions of the partial facility closure plan will be subject to public review and public comment at "final closure", pursuant to 30 TAC §335.118 which adopts by reference 40 Code of Federal Regulations §§265.110-120. Final closure occurs when the last RCRA-regulated (subject to permitting) hazardous waste management unit is closed at a facility.

If you have any questions regarding the closure certification, please contact Luis Campos of the Closure Team in Austin at 512/239-2369, Mail Code MC-127.

Sincerely,



Paul S. Lewis, Manager
Corrective Action Section
Industrial and Hazardous Waste Division

LEC:lec

cc: TNRCC Region 13 Office, San Antonio
TNRCC Financial Assurance Section/Division, OAS
TNRCC Data Control Team, Waste Evaluation Section
Tennie Larson, Corrective Action Section



TEXAS WATER COMMISSION
Stephen F. Austin State Office Building
Austin, Texas

PERMIT NO. HW-50294-001

EPA PERMIT NO. TXD 052649027-1

PERMIT FOR INDUSTRIAL
 SOLID WASTE MANAGEMENT SITE
 issued under provisions of TEX.
 HEALTH & SAFETY CODE ANN.
 Chapter 361 (Vernon)

Name of Permittee:

Hydrocarbon Recyclers of San Antonio
 d.b.a. USPCI
 4303 Profit Drive
 San Antonio, Texas 78219

Site Owner:

USPCI, Inc.
 515 W. Greens Rd., Suite 500
 Houston, Texas 78219

Registered Agent for Service:

C.T. Corporation
 350 N. St. Paul Street
 Dallas, Texas 75201

Classification of Site:

Class I Hazardous Waste, Class I
 Industrial Solid Waste
 Off-site Storage and Processing

The permittee is authorized to store and process wastes in accordance with limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Texas Water Commission (TWC) and other Orders of the TWC, and laws of the State of Texas. Nothing in this permit exempts the permittee from compliance with the applicable rules and regulations of the Texas Air Control Board (TACB). This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store and process wastes shall expire midnight, 10 years after the date of permit approval.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of HSWA for which the Texas Water Commission has not been authorized.

ISSUED DATE: JUL 03 1992

ATTEST:

Blasina A. Vasquez

John Hall
 For the Commission

PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME: USPCI

CONTINUATION SHEET 2 OF 33

I. Size and Location of Facility

- A. The industrial solid waste management facility is located at 4303 Profit Drive, in the City of San Antonio, Bexar County, Texas, in the drainage area of Segment 1901 in the San Antonio River Basin (North Latitude 29°26'33", West Longitude 98°24'33").
- B. The legal description of the site submitted in permit No. HW-50294-001 application dated November 7, 1988 is hereby made a part of this permit as "Attachment A".

II. Units and Operations Authorized

A. Wastes Authorized:

The permittee is authorized to manage industrial solid wastes listed in the application as described herein, subject to the limitations provided herein.

Hazardous wastes are limited as follows:

1. Hazard Code groups (as prescribed by the U.S. Environmental Protection Agency regulations in effect upon the date of permit approval):

<u>X</u> Ignitable Waste (I)	<u>X</u> Acute Hazardous Waste (H)
<u>X</u> Toxic Waste (T)	<u>X</u> EP Toxic Waste/Toxicity Characteristic (E)
<u>X</u> Corrosive Waste (C)	<u>X</u> Reactive Waste (R)

2. Waste Descriptions

	<u>TWC Waste Class</u>	<u>Hazard Codes</u>
a. Blended waste-derived fuel	IH	I, T, C, E, R
b. Waste oil	IH, I	I, T, C, E, R, H
c. Waste solvents	IH	I, C, E, R, T
d. Waste paint and thinners	IH, I	I, C, E, R, T
e. Waste alcohols	IH	I, C, E, R, T
f. Waste halogenated solvents	IH	I, T, C, E, R
g. Contaminated process water and contaminated stormwater	IH, I	I, T, C, E, R, H
h. Corrosives	IH	C

PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME: USPCI

CONTINUATION SHEET 3 OF 33

[II.A.2.h.]

i. Contaminated sludges, solids, and soils	IH	I.T.C.E.R.H
j. Reactive wastes	IH	R
k. Materials for incineration	IH.I	I.T.C.E.H
l. Brokered materials	IH.I	I.T.C.E.H.R

3. Prohibited Wastes:

- a. Polychlorinated biphenyls (PCBs) which are subject to regulations issued pursuant to the Toxic Substance Control Act (TSCA) (40 CFR Part 761.3);

Radioactive or nuclear waste material (i.e., waste material which emits ionizing radiation spontaneously);

- c. Explosive material as defined by the Department of Transportation (DOT) under 49 CFR Part 173; and

- d. The following wastes listed under 40 CFR Part 261.31: F020, F021, F022, F023, F026, and F027.

4. Prior to accepting any additional waste with chemical characteristics similar to those authorized by Provision II.A.2, the permittee shall:

- Notify the Executive Director.
- Provide a characterization of the waste demonstrating its similarity.
- Submit, upon request of the Executive Director, such information as may reasonably be required to enable the Executive Director to ascertain the waste similarity; and
- Receive written authorization of the Executive Director.

B. Facilities and Functions Authorized

The permittee is authorized to operate the following facility units and perform the following functions for storage and processing, subject to the limitations as described below. All waste management activities are to be confined to the authorized facility units except as otherwise

PERMIT NO. HW-50294-001
EPA PERMIT NO. TXD 052649027-1
NAME: USPCI

CONTINUATION SHEET 4 OF 33

[II.B.]

exempted from permitting under Title 31 Texas Administrative Code (TAC) Chapter 335. All authorized facility units shall hereinafter be identified as numbered below (e.g., "Permit Unit No. ____");

1. Tank, cone fixed roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T1 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-f.
2. Tank, cone fixed roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T2 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-f.
3. Tank, cone fixed roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T3 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-f.
4. Tank, cone fixed roof, cone bottom, 10,132 gallons capacity, 10 foot diameter, 18 foot height, carbon steel, above grade, identified as tank T4 in the permit application for storage and processing of wastes described in Provisions II.A.2.a.-f.
5. Tank, cone fixed roof, cone bottom, 10,132 gallons, 10 foot diameter, 18 foot height, carbon steel, above grade, identified as tank T5 in the permit application, for storage and processing of wastes described in Provisions II.A.2.d.
6. Tank, cone fixed roof, cone bottom, 10,132 gallons, 10 foot diameter, 18 foot height, carbon steel, above grade, identified as tank T6 in the permit application, for storage and processing of wastes described in Provision II.A.2.c.-d.
7. Tank, cone fixed roof, cone bottom, 3,850 gallons, 6 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T7 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c. and c.-f.

PERMIT NO. HW-50294-001
EPA PERMIT NO. TXD 052649027-1
NAME: USPCI

CONTINUATION SHEET 5 OF 33

[11.B.8.]

8. Tank, cone fixed roof, cone bottom, 3,856 gallons, 6 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T8 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c. and e.-g.
9. Tank, cone fixed roof, cone bottom, 3,856 gallons, 6 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T9 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c. and e.-g.
10. Tank, cone fixed roof, cone bottom, 3,856 gallons, 6 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T10 in the permit application for storage and processing of wastes described in Provisions II.A.2.a.-c. and e.-g.
11. Tank, flat fixed roof, cone bottom, 8,813 gallons, 10 foot diameter, 16 foot height, carbon steel, above grade, identified as tank T11 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-c. and g.-h.
12. Tank, 24,000 gallons, carbon steel, above grade, identified as tank T12 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c.-f.
13. Tank, cone fixed roof, cone bottom, 7,000 gallons, 7 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T13 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c.-f.
14. Tank, cone fixed roof, cone bottom, 7,000 gallons, 7 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T14 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c.-f.
15. Tank, cone fixed roof, cone bottom, 7,000 gallons, 7 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T15 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c.-f.
16. Tank, open roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T27 in the permit application, for storage and processing of wastes described in Provisions II.A.2.g.

PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027.1
 NAME: USPCI

CONTINUATION SHEET 6 OF 33

[II.B.17]

17. Tank, open roof, cone bottom, 14,750 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T28 in the permit application, for storage and processing of wastes described in Provisions II.A.2.g.
 18. Tank, 165 gallons, stainless steel, above grade, identified as tank T54 in the permit application for storage of wastes described in Provision II.A.2.a.-i., k. and l.
 19. Tank, 650 gallons, aluminum, above grade, identified as tank T82 in the permit application, for storage of wastes described in Provisions II.A.2.c., e.-g.
 20. Container storage area, maximum storage capacity of 1,108 55-gallon drum equivalents (60,940 gallons), for storage and processing of all authorized wastes.
 21. One tank identified as Tank T-52 is not being authorized in this permit, and is to be operated in accordance with the interim status requirements incorporated by reference in 31 TAC Subchapter E (including the requirements incorporated by reference in 31 TAC Section 335.112) until such later date as this tank is authorized by permit amendment or modification.
- C. Authorization to operate this facility is contingent upon maintenance of financial assurance pursuant to Provision IV.A. and liability insurance requirements pursuant to Provision III.B.12. Authorization to begin operation of new or modified facility units is contingent upon compliance with Provisions IV.A. and V.C. Permittee may not store or process waste unless compliant with all financial assurance and liability requirements, which shall include all related financial assurance instruments being in full force and effect.
- D. The facility units and operational methods authorized are limited to those described herein and by the following application submittals:
 July 29, 1988 - A revised Part A Application requesting expansion under Interim Status;
 November 7, 1988 - The initial Part B Application;
 November 16, 1988 - A revised Part A application including Waste Oil;
 November 21, 1989 - Technical Notice of Deficiency response including Parts A and B materials;
 June 20, 1990 - Revision of Part A to include U359 in the waste listing;
 August 1, 1990 - Revision of Part A tables III-1 and III-2, and page 2 of the Part B application;
 October 22, 1990 - Comments on Initial Draft Permit and Revised Part A application;

PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME: USPC:

CONTINUATION SHEET 2 OF 33

[II.D]

- December 20, 1990 - Revised listing of proposed tank contents;
- February 6, 1991 - Revised Waste Analysis Plan and Revised Part A application;
- March 21, 1991 - Revisions to Waste Analysis Plan; and
- April 4, 1991 - A revised Waste Analysis Plan.

Submittals to the Texas Air Control Board are listed in Provision IX.11. All facility units and operational methods are subject to the terms and conditions of this permit and TWC Rules. Prior to constructing or operating any facility unit in a manner which differs from the related plans and specifications, the permittee is required to:

1. Notify the TWC and submit plans and specifications for the proposed modifications; and

Receive written authorization from the Executive Director.

- E. Any proposed facility modification, addition of units, or expansion in capacity which has not been addressed by the terms of this permit must be authorized in accordance with TWC amendment rules.

III. Facilities Design, Construction, and Operation

A. General Design, Construction, and Operation Requirements:

1. Facility design, construction, and operation shall comply with this permit and TWC rules and be in accordance with all plans and specifications for design, construction and operation approved by the terms of this permit. All plans and specifications for design, construction, and operation submitted with the permit application submittals noted in Provision II.D are approved, subject to the terms of this permit and any other orders of the Texas Water Commission.
2. The entire waste management facility shall be designed, constructed, operated, and maintained to prevent inundation of and discharges from the areas surrounding the facility units authorized by Provision II.B, subject to the following requirements. Each storage and processing area, including unloading areas, shall be provided with a drainage control system which will collect spills and incident precipitation in such a manner as to:
 - a. Preclude the release from the system of any collected spills, leaks, or precipitation, except as provided in Provision III.B.3. This requirement shall be met by, at a minimum, providing a base and sides which are free of cracks or gaps

COMPLIANCE SUMMARY

Hydrocarbon Recyclers Inc. d.b.a. USPCI
Proposed Permit No. HW-50294-001
August 2, 1991

CURRENT ASSESSMENT OF COMPLIANCE

General: Hydrocarbon Recyclers Inc. d.b.a. USPCI (HRI) is currently under an Agreed Enforcement Order dated July 3, 1991. An Administrative Penalty of \$19,200 was assessed. Terms and conditions of the Order are currently being complied with. HRI was determined to be noncompliant with 31 Texas Administrative Code (TAC) §335.2 and §335.43 - Permit Required. Hazardous wastes were being stored in tank railcars by HRI at the Union Pacific Travis Yard without a permit. HRI is currently in the process of removing wastes and cleaning the tank railcars.

District Inspections: May 28 and June 4, 1991 - No significant violations were reported.

November 27, December 3, 7, 12, 18 1990 - Permittee was subject of a Compliance Evaluation Inspection (CEI) resulting in a Notice Of Violation (NOV) dated February 22, 1991 which resulted in the Administrative Order mentioned above.

May 17 and 25, 1990 - Permittee was subject of a CEI resulting in a NOV dated August 15, 1990. A violation noted on the NOV dated December 21, 1989 was noted again. The facility was found to have stored a 55-gallon hazardous waste drum in a satellite waste accumulation area, to have stored a drum of flammable waste in an area reserved for acid storage, and the facility had not yet fixed cracks in the waste-proof liner of the tank farm secondary containment system. All noncompliances were addressed.

November 27, 1989 - Permittee was subject of a CEI resulting in an NOV dated December 21, 1989. Cracks in a waste-proof liner in the tank farm secondary containment system were observed, and a tank assessment was also required for one tank at the facility. The tank system assessment was submitted.

April 26, 1989 - Permittee was subject of a CEI. No significant violations were observed.

February 24 and March 1, 1989 - Permittee was subject of a Compliance Schedule Evaluation (CSE). No significant violations were reported.

December 28, 1988 - Permittee was subject of a Special Inspection (SP). No significant violations were reported.

October 27, 1988 - Permittee was subject of a CEI resulting in an NOV dated November 18, 1988. Operational and recordkeeping

Compliance Summary
Page 2

deficiencies, consisting of an inaccurate Facility Notice of Registration, need of independent Professional Engineer assessment of all tank systems and need to date Land Disposal Restricted wastes upon receipt were noted. All noncompliances were addressed.

April 14, 1988 - Permittee was subject of a CEI. No significant violations were reported.

Current owner purchased facility from the previous owner, KDM Co.

August 21, 1987 - Previous owner was subject of a CEI resulting in an NOV dated October 13, 1987. Several operational deficiencies, such as poor training record maintenance, lack of a written equipment inspection schedule, and open containers in the Container storage area were noted. All noncompliances were addressed.

September 19, 1986 - Previous owner was the subject of a CEI resulting in an NOV dated September 21, 1986. The company was required to submit notification and part A amendment information for a sludge solidification process. All noncompliances were addressed.

Hazardous Waste Fees: Current

PENDING ENFORCEMENT ACTION

No new enforcement action is pending.

PRIOR ENFORCEMENT ACTION

Previous owner was the subject of a Consent Agreement and Final Order issued August 31, 1987 by EPA. Previous owner violated Subtitle C of RCRA, Section 3004, 42 U.S.C. §6294 and Texas Solid Waste Disposal Act, Vernon's Ann. Civ. St. Art. 4477-7 regarding the liability insurance requirement. The Order required the previous owner to obtain liability insurance for the facility. An administrative penalty of \$2500 was assessed. All noncompliances were addressed.

CONTACT

William J. Shafford, 475-2339

EXECUTIVE DIRECTOR
TEXAS WATER COMMISSION
ATTN: Hazardous and Solid Waste Division
P.O. Box 13087, Capitol Station
Austin, Texas 78711

FOR DEPARTMENT USE ONLY
Application No. _____
Permit No. _____
Adm. Review By _____
Administratively _____
Complete _____
Copies Sent: _____

INDUSTRIAL HAZARDOUS WASTE PART B PERMIT APPLICATION

Please refer to the Instructions when preparing this application.

I. GENERAL INFORMATION

A. Applicant: Hydrocarbon Recyclers, Inc.
(Individual, Corporation, or Other Legal Entity Name)

Address: 4303 Profit Drive

City: San Antonio State: Texas Zip Code: 78219

Telephone Number: (210) 304-3000

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas. 279035
(Charter Number)

- B. 1. List those persons or firms, including a complete mailing address and telephone number, authorized to act for the applicant during the processing of the permit application.

Robert Apple, Vice President
4303 Profit Drive
San Antonio, Texas 78219
(210) 304-3000

2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

CT Corporation System
The Corporation Trust Company
350 N. St. Paul
Suite 2900
Dallas, Texas 75201

3. List the individual and his/her mailing address that will be responsible for causing notice to be published in the newspaper.

Phillip Gover
Facility Manager
4303 Profit Drive
San Antonio, Texas 78219

C. Facility for Which Application is Submitted: _____

Hydrocarbon Recyclers, Inc.

TWC Registration No.: 31905 EPA I.D.No.: TXD052649027

County: Bexar

- D. 1. Provide a general description of the portion of the facility covered by this application (schematic or block flow diagram, verbal description, photograph, etc.) Note any changes from the original Part A application.

Hydrocarbon Recyclers, Inc. d/b/a USPCI is a wholly owned subsidiary of USPCI, Inc. Hazardous waste management at the facility includes solvent recycling, kiln fuel blending, repackaging for incineration, accumulation for hazardous waste landfill disposal and processing for waste minimization; the facility currently operates under interim status. The facility was purchased from KDM Company by Hydrocarbon Recyclers, Inc. in 1988. The units addressed by this Part B application include the newly constructed waste storage tanks as well as the container storage building.

2. List the facility units covered by this application. List the waste managed in each unit and the rated capacity or size of the unit.

Facility Unit	Waste Type	Rated Capacity
Tank T1	Blended Waste-Derived Fuel Waste Halogenated Solvents	10,774 gallons
Tank T2	Blended Waste-Derived Fuel Waste Halogenated Solvents	10,774 gallons
Tank T3	Blended Waste-Derived Fuel Waste Halogenated Solvents	10,774 gallons
Tank T4	Blended Waste-Derived Fuel Waste Halogenated Solvents	10,132 gallons
Tank T5	Waste Paint & Thinners	10,132 gallons
Tank T6	Waste Solvents Waste Paint & Thinners	10,132 gallons
Tank T7	Waste Alcohols/Contaminated Process Water & Stormwater	1,856 gallons
Tank T8	Waste Solvents Waste Alcohols	1,856 gallons
" "	Contaminated Process Water Contaminated Stormwater	" "
Tank T9	Waste Solvents Waste Alcohols	1,856 gallons
" "	Contaminated Process Water Contaminated Stormwater	" "

(See Continuation Sheet, next page)

Facility Unit	Waste Type	Rated Capacity
Tank T10	Blended Waste Derived Fuel	
" "	Waste Solvents	<u>3,856 gallons</u>
" "	Waste Alcohols	" "
" "	Contaminated Process Water	" "
" "	Contaminated Stormwater	" "
Tank T11	Blended Waste Derived Fuel	
" "	Waste Solvents	<u>8,813 gallons</u>
" "	Contaminated Process Water	" "
" "	Contaminated Stormwater	" "
" "	Corrosives	" "
Tank T12 (future)	Waste Solvents	
Tank T13	Waste Halogenated Solvents	<u>24,000 gallons</u>
Tank T14	Waste Solvents	
Tank T15	Waste Halogenated Solvents	<u>7,000 gallons</u>
Tank T16	Waste Solvents	<u>7,000 gallons</u>
Tank T17	Waste Halogenated Solvents	<u>7,000 gallons</u>
Tank T18	Contaminated Process Water	
Tank T19	Contaminated Stormwater	<u>19,774 gallons</u>
Tank T20	Contaminated Process Water	
Tank T21	Contaminated Stormwater	<u>19,774 gallons</u>
Tank T52	Liquid/Sludge Solid Waste	<u>350 gallons</u>
Tank T53	Blended Waste-Derived Fuel	
" "	Contaminated Sludges, Solids	<u>163 gallons</u>
" "	and Solids	" "
" "	Materials for Incineration	" "
" "	Brokered Materials	" "
Tank T54	Waste Solvents	
" "	Waste Alcohols	<u>630 gallons</u>
" "	Contaminated Process Water	" "
" "	Contaminated Stormwater	" "
Drum Dock	Volume of 1,118 55-gal. drums	

USPCIA Subsidiary of
Union Pacific Corporation

Hydrocarbon Recovery Services

May 10, 1993

Anthony Grigsby
Executive Director
Texas Water Commission
P.O. Box 13087
Capitol Station
Austin, TX. 78711-3087

Re: Hydrocarbon Recyclers Inc. of San Antonio
d/b/a/ USPCI Treatment and Recovery Services
TWC Permit No. HW-50294-001

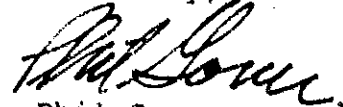
Dear Mr. Grigsby;

Hydrocarbon Recyclers Inc. of San Antonio d/b/a USPCI submits this notification in accordance with Provision V.I.2. of the referenced permit. USPCI has recently become aware of the presence of two (2) solid waste management units not previously identified in the RCRA Facility Assessment. Accordingly, we hereby submit preliminary assessment information currently available for these two non-RCRA regulated units.

Based upon the size of the units and the de minimis potential for release of constituents to ground or surface water, USPCI has concluded that no further action is necessary at this time.

Should you have any questions about the information submitted with this letter, please feel free to contact me or Margie Stokes, Environmental Compliance Officer at the facility.

Sincerely;



Phil Gover
Facility Manager

cc: Allyn Davis, EPA Region VI
Bill Shafford, TWC
Margie Stokes, USPCI
Russell Zora, USPCI
Bill Vore, USPCI

Hydrocarbon Recyclers of San Antonio
May 10, 1993

UNIT A001 - Historic Empty Container Storage Area

I. Unit Location

- a. See Attachment 1 - Site Plan. Solid Waste Management Unit (SWMU) A001 is identified on this drawing.

II. Type of Unit

- a. SWMU A001 is a storage rack previously used to store empty, rinsed, and drained containers (i.e., drums). This rack is currently in use for the storage of overpack containers.

III. Dimensions and Structural Description

- a. The storage rack (SWMU A001) is located on gravel adjacent to the wall of the drum dock. Dimensions of this SWMU are approximately 75 feet in length, 3 feet in width, and 6 feet in height.

IV. Period of Operation

- a. SWMU A001 operated from approximately October 1992 to March 1993. Currently the container storage rack is in use for overpack containers only.

V. Wastes Managed at the Unit

- a. All containers stored in this unit were RCRA empty, rinsed, and drained prior to storage. *De minimis* organic constituents may have been present on the exterior of the containers, and therefore subject to environmental weathering.

VI. Release History

- a. See Attachment 2 for information pertaining to potential contaminate release from the unit.

VII. Summary

- a. No visible contamination of soil or surface water is present. Based upon the size of SWMU A001, the *de minimis* potential for release of constituents to soil or surface water, and the results of the TWC's Compliance Evaluation Inspection (Attachment 2), USPCI has concluded that no further action is necessary at this time.

Hydrocarbon Recyclers of San Antonio
May 10, 1993

UNIT A002 - Scrap Equipment Pile

I. Unit Location

- a. See Attachment 1 - Site Plan. Solid Waste Management Unit (SWMU) A002 is identified on this drawing.

II. Type of Unit

- a. This unit is generally comprised of a pile of scrap metal intended for reuse (i.e., pipes, fittings, etc.). PVC pipe may be present.

III. Dimensions and Structural Description

- a. Scrap metal (or PVC) is placed on pallets, directly on the ground, or in containers. This storage area is approximately rectangular; 10 feet in width and 40 feet in length.

IV. Period of Operation

- a. The scrap equipment pile has been in operation from approximately November of 1991 to the present time.

V. Wastes Managed in the Unit

- a. The exterior of all equipment in this SWMU is free of visible contamination. De minimis organic constituents may be present on the exterior of the equipment and therefore subject to environmental weathering.

VI. Release History

- a. There is no visible evidence of any release of hazardous constituents to soil or surface water.

VII. Summary

- a. No visible contamination of soil or surface water is present. Based upon the size of SWMU A002 and the de minimis potential for release of constituents to soil or surface water, USPCI has concluded that no further action is necessary at this time.

TEXAS WATER COMMISSION



Allen Benke, Executive Director
 Michael E. Field, General Counsel
 Brenda W. Foster, Chief Clerk

July 19, 1989



W. R. Lyons, III, Chairman
 Paul Hopkins, Commissioner
 John G. Hinchins, Commissioner

Mr. Sam Cowan

Hydrocarbon Recyclers, Inc.
 1000 Classen Center, Suite 400 South
 Oklahoma City, Oklahoma 73106

Re: Closure Plans for Hazardous Waste Tanks 3, 4, 8, 10, 11, 12,
 13, 14, 23, 24, 25, 26, 27, 28, 29, 30, 33, 34, 35, and
 Five 300 Gallon Tanks

Hydrocarbon Recyclers, Inc. (HRI) - San Antonio, Texas
 Industrial Solid Waste Registration No. 31905
 EPA I. D. No. TXD 052649027
 Proposed Hazardous Waste Permit No. HW-50294-000

Dear Mr. Cowan:

We have reviewed your submittal dated July 11, 1989 transmitting closure plans for 24 hazardous waste storage tanks at your facility. The closure plans have been evaluated pursuant to applicable closure requirements of 31 Texas Administrative Code (TAC) Sections 335.112(a)(6), and 335.112(a)(9).

This letter constitutes approval by the Executive Director of the aforementioned closure plans. Our evaluation indicates that your closure activities should provide reasonable assurance of effective industrial solid waste management.

However, it is the continuing obligation of persons associated with a site to assure that the management of industrial solid waste is conducted in such a way that it does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 31 TAC 335.4. If the closure activity or actual closure does not achieve these requirements, the burden remains upon Hydrocarbon Recyclers, Inc. to submit an amendment to the closure plan and to take any necessary and legal actions to correct such conditions.

Mr. Ted Cowan

Page 2

Should you have any questions regarding this matter, please contact Sandy Harwood of the Hazardous and Solid Waste Section at ACS12/463-9886.

Sincerely,



Daniel J. Eden, Director
Hazardous and Solid Waste Division

HSH:lab

cc: Bob Turnbow, HRI - San Antonio
TWC District 8 Office - San Antonio

TABLE 1
*****changed
Keep to MoveTANK LIST

1	Paint Thinner 3,000 Gallon	Stainless Steel	Move
2	Clean Product 8,000 Gal.	Carbon Steel	Move
3	Still Bottoms 5,000 Gal.	Carbon Steel	Close
4	Still Bottoms 5,000 Gal.	Carbon Steel	Close
5	2,500 Gal.	Fiberglass	Move
6	2,500 Gal.	Fiberglass	Move
7	KDM Raw Product 2,000 Gal.	Carbon Steel	Move
8	Closed Feed 2,000 Gal.	Carbon Steel	Move
9	Waste Water Tank 2,000 Gal.	Carbon Steel	Close
10	Chlorinated Bottoms 2,000 Gal.	Carbon Steel	Close
11	KDM Raw Product 500 Gal.	Carbon Steel	Move
12	Finished Product 2,000 Gal.	Stainless Steel	Move
13	Chlorinated Still Bottoms 2,000 Gal.	Carbon Steel	Close
14	Flash Still Bottoms 2,000 Gal.	Carbon Steel	Close
15	Chlorinated Still Bottoms 2,000 Gal.	Carbon Steel	Close
24	Flash Still Bottoms 2,000 Gal.	Carbon Steel	Close

25	Paint Still Bottoms 2,000 Gal.	Carbon Steel	Close
27	Generic Thinner-Feed 6,000 Gal.	Carbon Steel	Move
28	Safety Clean Feed Tank 6,000 Gal.	Carbon Steel	Close
29	Dispersion Fluid 6,000 Gal.	Carbon Steel	Move
33	Kiln Fuel 6,000 Gal.	Carbon Steel	Move
34	Kiln Fuel 6,000 Gal.	Carbon Steel	Move
35	Kiln Fuel 6,000 Gal.	Carbon Steel	Move
36	Clean Product 5,000 Gal.	Stainless Steel	Move

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION


 NOTICE OF APPLICATION FOR AN AMENDMENT TO A COMMERCIAL INDUSTRIAL
HAZARDOUS WASTE STORAGE AND PROCESSING FACILITY PERMIT

HYDROCARBON RECYCLERS, INC., OF SAN ANTONIO DBA USPCI, 4303 Profit Drive, San Antonio, Texas 78219 has applied to the Texas Natural Resource Conservation Commission (TNRCC) for an amendment to Permit No. HW50294-001 which authorizes the operation of an industrial solid waste storage and processing facility for the management of Class I hazardous and Class I non-hazardous industrial solid waste. The units currently authorized by the permit consist of 18 existing tanks, one proposed tank, and one existing container storage area. The amendment would authorize: (1) the continued operation of an existing 350-gallon tank (identified as T-52 in the permit application), (2) revisions to the Waste Analysis Plan, and (3) revisions to the Office of Air Quality provisions of the permit. The facility stores and processes waste-derived fuels, waste oils, waste solvents, paint wastes, corrosives, wastewaters, reactive wastes, incinerable wastes, contaminated soils and sludges, and certain brokered materials. The wastes are received from off-site sources on a commercial basis.

The facility is located at 4303 Profit Drive in San Antonio, Bexar County, Texas. This location is in the drainage area of Segment No. 1901 of the San Antonio River Basin (29°26'33" north latitude, 98°24'33" west longitude).

The Executive Director of the TNRCC has prepared a draft permit which, if approved, will authorize the continued operation of this facility under the terms described above. A copy of the draft permit is available for inspection in the Office of the Chief Clerk, Texas Natural Resource Conservation Commission, 1700 North Congress Avenue, Austin, Texas 78701. The Executive Director has also prepared a summary of the applicant's compliance history at this facility, copies of which are available upon request.

Legal Authority: Chapter 5 of the Texas Water Code (as amended); Chapter 361 of the Texas Health and Safety Code (as amended); and 30 Texas Administrative Code Chapters 305 and 335 of the Rules of the Texas Natural Resource Conservation Commission.

This notice satisfies the requirements of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6901 et seq. and 40 CFR §124.10. The permit, if issued by the TNRCC and the U.S. Environmental Protection Agency (EPA), will implement the requirements of the Hazardous and Solid Waste Amendments of 1984 (HSWA), amending the Federal Solid Waste Disposal Act, as amended, including all of the state authorized requirements as published through May 24, 1990, 55 Federal Register 21383. The TNRCC and EPA have entered into a joint permitting agreement whereby permits will be issued in Texas in accordance with the Texas Health and Safety Code, Chapter 361 and RCRA, as amended. In order for the applicant to have a fully effective RCRA permit, both the TNRCC and the EPA must issue the permit. All permit provisions are fully enforceable under State and Federal law. The State of Texas has not received full HSWA authority. Areas in which the TNRCC has not been authorized by EPA are denoted in the draft permit with an asterisk (*).

This application is subject to a Commission resolution adopted August 18, 1993, which directs the Commission's Executive Director to act on behalf of the Commission and issue final approval of certain permitting matters. The Executive Director will issue this permit unless one or more persons file written protests and/or a request for a hearing within 45 days after publication of this notice.

If you wish to request a public hearing, you must submit your request in writing. You must state (1) your name, mailing address and daytime phone number; (2) the permit number or other recognizable reference to this application; (3) the statement "I/we request a public hearing;" (4) a brief description of how you, or the persons you represent, would be adversely affected by the granting of the application; (5) a description of the location of your property relative to the applicant's operations; and (6) your proposed adjustment to the application/permit which would satisfy your concerns and cause you to withdraw your request for hearing. If one or more protests and/or requests for hearing are filed, the Executive Director will not issue the permit and will forward the application to the Office of Hearings Examiners where a hearing may be held. In the event a hearing is held, the Office of Hearings Examiners will submit a recommendation to the Commission for final decision.

Any person will be allowed to make oral or written statements at the public hearing. In addition, a time may be set aside at the public hearing for an informal public comment session and negotiation regarding issues of concern. The Executive Director of the TNRCC will consider all information submitted in making a final recommendation and will respond in its recommendation to the TNRCC, and subsequently in writing at the time the final decision is made, to any significant comments made at or in connection in the public hearing session. EPA may participate in the public hearing. The hearing may be continued from time to time and place to place, if necessary, to develop all relevant evidence bearing on the subject of the hearing.

If no protests or requests for hearing are filed, the Executive Director will sign the permit 45 days after publication of this notice or thereafter. If you wish to appeal a permit issued by the Executive Director, you may do so by filing a written Motion for Reconsideration with the Chief Clerk of the Commission no later than 20 days after the date the Executive Director signs the permit.

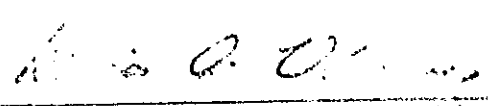
Decisions regarding the permit provisions issued under State authority may be reconsidered in response to a motion for reconsideration and by appeal to a District Court in Travis County. Decisions regarding the permit provisions issued under federal authority may be reconsidered in accordance with procedures of 40 CFR §124.19.

Requests for a public hearing and/or requests for further information concerning this application should be submitted in writing to Kerry Sullivan, Assistant Chief Hearings Examiner, TNRCC, P. O. Box 13087, Austin, Texas 78711, telephone 512/463-7875. Written comments on the application should be submitted to the same address within 45 days of the date of publication of this notice of application. Technical information can be obtained by contacting William Shafford, at the same address or by telephone at 512/239-6621. Information concerning participating in hearings may be obtained by contacting Mark Alvarado, Public Interest Counsel, at the same address or telephone 512/239-6363.

Persons wishing to comment or request a hearing on a HSWA requirement denoted with an asterisk (*) in the draft permit should also notify, in writing, the Chief of the RCRA Permits Branch, Environmental Protection Agency Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733. EPA will accept hearing requests submitted to the TNRCC.

Issued this 4th day of January 1994.

(SEAL)


Gloria A. Vasquez, Chief Clerk
Texas Natural Resource Conservation Commission

31905

TANKS TABLE

RFI Tank For Status	Tk Cap Spd. I	Tk Identity	NOR Fee	Location	New or Exist. Tk	Date put into Svc Date due 2d Cont.	Waste Handled Violation of Rules, Not with Section & G # only
P	18774	T1	03	*	NEW	APR 89	HW DERIVED FUEL 1004.008,0181
						APR 89	
P	18774	T2	04	*	NEW	APR 89	HW DERIVED FUEL 1004.008,0181
						APR 89	
P	18774	T3	06	*	NEW	APR 89	HW DERIVED FUEL 1004.008,0181
						APR 89	
P	10132	T4	08	*	NEW	APR 89	DISPENSING SOLVENT
						APR 89	
P	10132	T5	07	*	NEW	APR 89	PAINT THINNER
						APR 89	
P	10132	T6	06	*	NEW	APR 89	PAINT THINNER
						APR 89	
P	3866	T7	08	*	NEW	APR 89	WASTE ALCOHOL
						APR 89	
P	3866	T8	10	*	NEW	APR 89	HALOGENATED SOLVENTS
						APR 89	
P	3866	T9	11	*	NEW	APR 89	HALOGENATED SOLVENTS
						APR 89	
P	3866	T10	12	*	NEW	APR 89	HALOGENATED SOLVENTS
						APR 89	
P	6813	T11	13	*	NEW	APR 89	WASTEWATER
						APR 89	
P	750	T12	14	*	NEW	APR 89	VAPOR RECOVERY TANK FOR T64
						APR 89	
P	186	T64	16	*	NEW	APR 89	SOLVENT CONTAMINATED SOLIDS
						APR 89	
P	7000	T13	18	*	NEW	1990	KLN FUEL
						1990	
P	7000	T14	17	*	NEW	1990	KLN FUEL
						1990	
P	7000	T15	18	*		1990	KLN FUEL
						1990	
P	18774	T27	19	*	NEW	APR 89	STORMWATER SPILL RESIDUAL
						APR 89	
P	18774	T28	20	*	NEW	APR 89	STORMWATER SPILL RESIDUAL
						APR 89	
I	350	T62	21	*	NEW	JUL 89	ORGANIC WASTE
						JUL 89	

NOTE: @ identity refers to Facility ID#, n.s. P. generated, Location status, C.

Storage 90-day storage, 5 small quantity generators, and 104-hazardous

TWC REG.NO. 31905

TANKS TABLE

(a) Tk Fac Status	Tk Cap (Gal.)	Tk Identity	NOR Fac#	Location	New or Exist. Tk	Date put into Svc Date due 2d Cont.	Waste Handled (NOR Waste stream #) Violation of Rules, list with Section & Q # only
P	19774	T1	03	*	N	APR 89	HW DERIVED FUEL (004,009,018)
P	19774	T2	04	*	N	APR 89	HW DERIVED FUEL (004,009,018)
P	19774	T3	05	*	N	APR 89	HW DERIVED FUEL (004,009,018)
P	10132	T4	06	*	N	APR 89	DISPERSING SOLVENT
P	10132	T5	07	*	N	APR 89	PAINT THINNER
P	10132	T6	08	*	N	APR 89	PAINT THINNER
P	3856	T7	09	*	N	APR 89	WASTE ALCOHOL
P	3856	T8	10	*	N	APR 89	HALOGENATED SOLVENTS
P	3856	T9	11	*	N	APR 89	HALOGENATED SOLVENTS
P	3856	T10	12	*	N	APR 89	HALOGENATED SOLVENTS
P	8813	T11	13	*	N	APR 89	WASTEWATER
P	19774	T27		*	N	APR 89	STORMWATER/SPILL RESIDUAL

NOTE: a Identify tanks as to Facility status, i.e. P-permitted, I-interim status, E-small quantity generator, and NH-nonhazardous

exempt 90-day storage, S-

TWC REG.NO. 31905

TANKS TABLE (CONT.)

(a) Tk Fac Status	Tk Cap (GAL.)	Tk Identity	NOR Fac#	Location	New or Exist. Tk	Date put into Svc Date due 2d Cont.	Waste Handled (NOR Waste stream #) Violation of Rules, list with Section & Q # only
P	19774	T28		*	N	APR 89	STORMWATER/SPILL RESIDUAL
I	350	T52		*	N	JUL 89	
P	165	T54	15	*	N	APR 89	SOLVENT CONTAMINATED SOLIDS
P	650	T82	14	*	N	APR 89	VAPOR RECOVERY TANK FOR T54

NOTE: a Identify tanks as to Facility status, i.e. P-permitted, I-interim status, E-exempt 90-day storage, S-small quantity generator, and NH-nonhazardous

* - Diagram Attached

DW0550

TEXAS WATER COMMISSION
NOTICE OF REGISTRATION
SOLID WASTE MANAGEMENT

04-06-92

THIS IS NOT A PERMIT AND DOES NOT CONSTITUTE AUTHORIZATION OF ANY WASTE MANAGEMENT ACTIVITIES OR FACILITIES LISTED BELOW. REQUIREMENTS FOR SOLID WASTE MANAGEMENT ARE PROVIDED BY TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TEXAS WATER COMMISSION (TWC). CHANGES OR ADDITIONS TO WASTE MANAGEMENT METHODS REFERRED TO IN THIS NOTICE REQUIRE WRITTEN NOTIFICATION TO THE TWC.

DATE OF NOTICE: 03-20-92

REGISTRATION DATE: 10-15-80

REGISTRATION NUMBER: 31905

EPA I.D. NUMBER: TXD052649027

THE REGISTRATION NUMBER PROVIDES ACCESS TO STORED INFORMATION PERTAINING TO YOUR OPERATION. PLEASE REFER TO THAT NUMBER IN ANY CORRESPONDENCE.

COMPANY NAME: USPCI HYDROCARBON RECOVERY SER
MAILING ADDRESS: VICES

4303 PROFIT DRIVE
SAN ANTONIO, TEXAS 78219

GENERATING SITE LOCATION:

4303 PROFIT DRIVE SAN ANTONIO, TEXAS

CONTACT PERSON: JIMI OLSEN

PHONE: (512) 333-4011

NUMBER OF EMPLOYEES: LESS THAN 100

TWC DISTRICT: 08

REGISTRATION STATUS: ACTIVE

REGISTRATION TYPE: GENERATOR/TRANSPORTER

HAZARDOUS WASTE STATUS:

GENERATOR/TRANSPORTER

WASTE GENERATED:

WASTE NUMBER	DESCRIPTION	CLASS	CODE	DISPOSITION
001	OIL, GREASE & SOLVENTS, MIXTURE	I	110860	NO LONGER GENERATED
002	POLYESTER RESINS	II	250300	NO LONGER GENERATED
003	CARBON BLACK	I	170660	NO LONGER GENERATED
004	STILL BOTTOMS, HALOGENATED SOL VENT DISTILLATION	IIH	952670	ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): F002

NOTICE OF REGISTRATION (CONTINUED)

PAGE 2

REGISTRATION NUMBER: 31905

COMPANY NAME: TREC HYDROCARBON RECOVERY SER

005 PAINT WASTE, SOLID IH 980450 NO LONGER GENERATED

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS):

006 PAINT WASTE, SOLID I 180450 NO LONGER GENERATED

007 PLANT REFUSE, GENERAL MISC. II 279760 NO LONGER GENERATED

008 METAL SCRAP III 370350 NO LONGER GENERATED

009 STILL BOTTOMS, SOLVENT, NONHAZ I 951870 ON-SITE/OFF-SITE/SOL
D FOR RECOVERY

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): F003, F005

016 CONTAINERS, SOLVENT CONTAMINATED, EMPTY I 175270 NO LONGER GENERATED

017 OIL, WASTE IH 910450 NO LONGER GENERATED

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): D001, D007, D008

018 FUEL IH 910450 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): D001, F001, F002, F003, F005

019 WATER CONTAINING MISC ORGANICS IH 906990 ON-SITE SANITARY SEW
ER /OFF-SITE (VIA PIPELINE)

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): D001, F001, F002, F003, F005

020 SOLIDS CONTAMINATED WITH HYDROCARBONS IH 978500 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): D001, F001, F002, F003, F005

11. Shipping/Reporting: Pursuant to Section 335 of the Texas Administrative Code of the rules of the TWC pertaining to Hazardous Waste management, issuance of manifests and annual reporting are required for Off-site Storage/Processing/Disposal of the following wastes listed in Part I. All manifested wastes should be reported on the annual waste summary report and submitted to the TWC by the 25th of each January for the prior calendar year.

004 952670 STILL BOTTOMS, HALOGENATED SOLVENT DISTILLATION

009 951870 STILL BOTTOMS, SOLVENT, NONHAZ

NOTICE OF REGISTRATION (CONTINUED)
 REGISTRATION NUMBER: 31905
 COMPANY NAME: USPCI HYDROCARBON RECOVERY SER

PAGE 3

GENERATED

018 917070 FUEL

020 978500 SOLIDS CONTAMINATED WITH HYDRO
 CARBONS

III. ON-SITE WASTE MANAGEMENT FACILITIES:

FAC NO.	FACILITY	STATUS
01	CONTAINER STORAGE AREA STORAGE OF WASTE NUMBER(S) 001, 002, 003, 004, 005, 006, 009, 017, 018, 019, 020 22,000 GAL	ACTIVE
02	TANK STORAGE OF WASTE NUMBER(S) 001, 004, 005, 006, 017 12,000 GAL	ACTIVE
03	TANK (SURFACE) STORAGE OF WASTE NUMBER(S) 004, 009, 018 19774 GAL. KILN FUEL STORAGE TANK T1	ACTIVE
04	TANK (SURFACE) STORAGE OF WASTE NUMBER(S) 004, 009, 018 19774 GAL. KILN FUEL STORAGE TANK T2	ACTIVE
05	TANK (SURFACE) STORAGE 19774 GAL. WASTE OIL STORAGE TANK T3	ACTIVE
06	TANK (SURFACE) STORAGE 10132 GAL. DISPENSING SOLVENT STORAGE TANK T4	ACTIVE
07	TANK (SURFACE) STORAGE 10132 GAL. WASTE PAINT THINNER STORAGE TANK T5	ACTIVE
08	TANK (SURFACE) STORAGE 10132 GAL. WASTE PAINT THINNER STORAGE TANK T6	ACTIVE

TWC Reg. No. 31905
 Attachment 3
 Page 3 of 5

NOTICE OF REGISTRATION (CONTINUED)
 REGISTRATION NUMBER: 31905
 COMPANY NAME: USPCI HYDROCARBON RECOVERY SER

PAGE 4

- | | | |
|----|--|--------|
| 09 | TANK (SURFACE)
STORAGE
3856 GAL.
WASTE ALCOHOL STORAGE TANK T7 | ACTIVE |
| 10 | TANK (SURFACE)
STORAGE
3856 GAL.
WASTE HALOGENATED SOLVENT STORAGE TANK T8 | ACTIVE |
| 11 | TANK (SURFACE)
STORAGE
3856 GAL.
WASTE HALOGENATED SOLVENT STORAGE TANK T9 | ACTIVE |
| 12 | TANK (SURFACE)
STORAGE
3856 GAL.
WASTE HALOGENATED SOLVENT STORAGE TANK T10 | ACTIVE |
| 13 | TANK (SURFACE)
STORAGE
8813 GAL
CONTAMINATED WASTE WATER STORAGE TANK T11 | ACTIVE |
| 14 | TANK (SURFACE)
PROCESSING
650 GAL.
TANK T82 USED TO CONDENSE & STORE LIQUIDS RECOVERED BY T54 | ACTIVE |
| 15 | TANK (SURFACE)
PROCESSING
WASTE NUMBER(S) 020
165 GAL.
SOLIDS DRYER TREATMENT TANK T54 | ACTIVE |

UNLESS OTHERWISE STATED ABOVE, FACILITIES ARE LOCATED
 AT 4303 PROFIT DRIVE SAN ANTONIO, TEXAS
 COUNTY OF BEXAR

IV. RECORDS.

- A. FOR PURPOSES OF FILING ANNUAL REPORTS PURSUANT TO TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TWC PERTAINING TO INDUSTRIAL SOLID WASTE MANAGEMENT, RECORDS SHOULD BE MAINTAINED FOR STORAGE, PROCESSING AND/OR DISPOSAL OF THE FOLLOWING WASTE(S) LISTED IN PART 1:

004 952670 STILL BOTTOMS, HALOGENATED SOLVENT DISTILLATION

009 951870 STILL BOTTOMS, SOLVENT, NONHALOGENATED

Filing No. 31905
 3
 4
 5

NOTICE OF REGISTRATION (CONTINUED)
REGISTRATION NUMBER: 31905
COMPANY NAME: USPCI HYDROCARBON RECOVERY SER

PAGE 5

018 917070 FUEL

019 906990 WATER CONTAINING MISC ORGANICS

020 978500 SOLIDS CONTAMINATED WITH HYDRO
CARBONS

31905
5 OF 5

13
Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

August 15, 1997

CERTIFIED MAIL P 458 045 745
RETURN RECEIPT REQUESTED

Mr. Mike Sanderock
Facility Manager
Hydrocarbon Recyclers, Inc., d.b.a. USPCI
4303 Profit Drive
San Antonio, Texas 78219

Re: Compliance Evaluation Inspection, Conducted 2-8 July 1997
TNRCC Industrial Solid Waste Reg.No. 31905, Permit No. 50294
EPA ID No. TXD052649027
Bexar County

Dear Mr. Sanderock:

On 2-8 July 1997, Mr. Rick Muñoz of the Texas Natural Resource Conservation Commission (TNRCC) conducted an inspection of the above-named facility. The inspection was conducted to determine the facility's compliance with applicable laws, regulations, and permit provisions pertaining to industrial solid waste management. During the inspection the inspector verbally notified Mr. Lynn Crane of some other concerns that were non-compliances which have been resolved through verbal notification and subsequent corrective action. However, the inspector also observed and documented conditions that we believe have not been resolved and constitute violations of the applicable requirements, as is explained in this letter and the attached summary.

The TNRCC recognizes that the great majority of the regulated community wants to prevent pollution and to comply with environmental laws. The agency looks forward to working with you to resolve these matters. We ask that you provide documentation demonstrating that the facility is in compliance no later than 30 calendar days from the date of receipt of this letter. We also ask that you advise us of any corrective action which you have taken already.

If Hydrocarbon Recyclers, Inc. responds within the specified time frame, completes any requested corrective action, and corrects the violations cited in the attached summary, we will not pursue further

REPLY TO: REGION 13 • 140 HELMER RD., SUITE 360 • SAN ANTONIO, TEXAS 78232-5042 • AREA CODE 210-490-3096

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000

printed on recycled paper using soy-based ink

Mr. Mike Sanderock
August 15, 1997
Page 2

action for the violations at this time. However, please note that the Legislature has granted the TNRCC enforcement powers to carry out its mission to protect human health and the environment. If you fail to adequately respond, we will exercise those powers.

We have attached to this letter a summary of alleged violations, citing the applicable TNRCC rules. Official copies of the TNRCC rules can be obtained from any of the following offices:

TNRCC Agency Publications Office
512/239-0028 (phone)
512/239-4488 (fax)

Texas Register
P.O. Box 13824
Austin, Texas 78711-3824
512/463-5561(phone)

West Publishing Company
P.O. Box 64526
St. Paul, MN 55164-0526
612/687-7000 (phone)

The applicable federal regulations are found in the Code of Federal Regulations, 40 CFR Parts 260-299. The federal regulations may be obtained from either of the following offices:

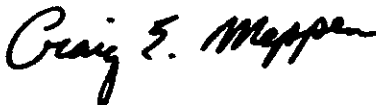
U.S. Government Printing Office
Texas Crude Building
801 Travis Street
Houston, Texas 77002
713/228-1187 (phone)

U.S. Government Printing Office
Room 1C-50
Federal Building
1100 Commerce Street
Dallas, Texas 75242
214/767-0076 (phone)

Please provide a written response to each outstanding alleged violation and area of concern within 30 calendar days from the receipt of this letter.

The Commission appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you have any questions regarding these matters, please contact Rick Muñoz at (210) 490-3096.

Sincerely,



for Henry Karnei, Jr.
Waste Program Manager, San Antonio Region 13

HK/rrm
Attachments

Mr. Mike Sanderock
 August 15, 1997
 Page 3

**SUMMARY OF RESOLVED AND OUTSTANDING ALLEGED VIOLATIONS
 HYDROCARBON RECYCLERS, INC.
 CEI INSPECTION CONDUCTED JULY 2-8, 1997**

SUMMARY OF RESOLVED VIOLATION

30 TAC 335.10 (b) (22) - Manifest Requirements.

The manifest shall contain the Texas Water Commission waste classification code assigned to the waste by the state.

Trans-shipment numbers for hazardous wastes shipped for customers through Hydrocarbon Recyclers, Inc. (HRI) to disposal facilities are assigned a trans-shipment (TSDF) number. Hazardous waste generated at the facility, by HRI, is assigned a Texas Hazardous Waste Code number authorized and listed on the Notice of Registration (NOR) for proper disposal. Hazardous Waste Manifest record review revealed that HRI has been listing both TSDF and Texas Hazardous Waste Code numbers assigned to the NOR on the same hazardous waste manifest. Copies of hazardous waste manifests obtained during the inspection include waste manifest #AR851749, #AR851750, #AR851751, #AR851752 dated April 23, 1997 to Ashgrove Cement, #AR851754 dated April 28, 1997 to Ashgrove Cement, and waste manifest #AR851753 dated April 24, 1997 to Ashgrove Cement. Listing both TSDF and Texas Hazardous Waste Code numbers on the hazardous waste manifests indicate that the hazardous waste was generated off site and at HRI.

At the time of the inspection, corrected copies of the manifests were provided to the inspector and to the receiving facility. The corrected hazardous waste manifests, listing the Texas Hazardous Waste Code assigned to the NOR, indicated that the hazardous waste shipped was generated by HRI at the facility. The facility has corrected the discrepancy. This violation has been resolved.

SUMMARY OF ALLEGED VIOLATION

30 TAC 335.6(c)(4) - Notification Requirements.

- (c) *Any person who generates hazardous waste in a quantity greater than the limits specified in §335.78 of this title (relating to Special Requirements for Hazardous Waste Generated by Conditionally Exempt Small Quantity Generators) in a calendar month or greater than 100 kilograms in a calendar month of industrial non-hazardous Class 1 waste shall notify the executive director of such activity on forms furnished or approved by the executive director. Such person shall also submit to the executive director upon request such information as may reasonably be required to enable the executive director to determine whether the storage, processing, or disposal is compliant with the terms of this chapter. Notifications submitted pursuant to this section shall be in addition to information provided in any permit applications required by §335.2 of this title (relating to Permit Required), or any reports required by §335.9*

Mr. Mike Sanderock

August 15, 1997

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of this title (relating to Record keeping and Annual Reporting Procedures Applicable to Generators), §335.10 of this title (relating to Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste), and §335.13 of this title (relating to Record keeping and Reporting Procedures Applicable to Generators of Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste). Any person who provides notification pursuant to this subsection shall have the continuing obligation to immediately document any changes or additional information with respect to such notification and within 90 days of the occurrence of such change or of becoming aware of such additional information, provide written notice to the executive director of any such changes or additional information to that reported previously. If waste is recycled on-site or managed pursuant to §335.2(d) of this title (relating to Permit Required), the generator must also comply with the notification requirements specified in subsection (h) of this section. The information submitted pursuant to the notification requirements of this subchapter and to the additional requirements of §335.503 of this title (relating to Waste Classification and Waste Coding Required) shall include, but is not limited to:

- (4) a proper hazardous waste determination which includes the appropriate EPA hazardous waste number(s) described in 40 Code of Federal Regulations Part 261.

Notification must be made by HRI to update the Notice of Registration (NOR) to reflect the current EPA hazardous waste numbers associated with Texas Hazardous Waste Code #004204H. Hazardous Waste Manifest #HCR01839 dated May 12, 1997 to Systech Environmental, #HCR01803 dated April 8, 1997 to TXI Operations, #HCR01715 dated January 3, 1997, and hazardous waste manifest #AR888472 dated April 28, 1997 to Ash Grove Cement Company list EPA #s D023, D024, D025, D035, D039, and D040. The NOR does not list these authorized EPA waste numbers. If this waste code is to be used for shipping wastes, the NOR should be updated to include these specific wastes.

HRI must update the NOR to reflect these EPA numbers for Texas Hazardous Waste Code #004204H. HRI must provide the San Antonio Regional Office with a copy of the notification documentation requesting to add the EPA waste code numbers to the NOR.

AREAS OF CONCERN

1. The inspection of the tanks under Permit Provision III.C.2 requires that HRI inspect above ground portions of the tank system. The tank permit number labeling on tank T-52, T-2, T-5 and T-13 is illegible. The tank permit numbers need to be legible on all permitted tanks.
2. During the site inspection, one full 55-gallon hazardous waste drum stored in the 90-day container storage area (CSA) was noted to have an "empty" label. The drum had both a hazardous waste label and the empty label. What protocols are in place to inspect the drums containing waste stored at CSA to prevent this occurrence?

Mr. Mike Sanderock
August 15, 1997
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3. In completing and maintaining operating records and tank transfer records, HRI inspectors are making corrections by applying "white-out" on the inspection logs. Review of inspection and operating records located in the Operations Control office adjacent to the tank pad revealed numerous record entries corrected using the white-out instead of showing a cross-out mark with the operator initial or signature. Remedial training is needed for HRI employees to impress the importance of accountability for any entry and completion of any maintenance or operating record on file to ensure that the inspection logs are completed and corrected properly. If this problem persists, and is noted in future scheduled inspections, a violation may be cited.
4. "Tank Inventory" records reviewed revealed that Tank T-8 does not receive incinerator water. The tank is now used to store kiln fuel. Notification is required to update the NOR to reflect the current wastes being placed into the permitted tanks. This area will be revisited during the next inspection.
5. Uniform Hazardous Waste Manifest #HCR01812 from HRI to Disposal Systems dated April 21, 1997 reflects a State Facility Identification number as WDW-70 which is a number assigned for Deep Well Disposal. According to Debbie Carter, File Manager, the correct Facility ID number should be 83093. Will the disposal facility receive copies or be notified of the discrepancy on the waste manifest?
6. Uniform Hazardous Waste Manifest #AR864576 shows that Leroy Hardwick Jr. received and signed for the waste listed on the manifest on February 15, 1997. The name, signature and date are crossed out and replaced with the name and signature of Billy Richard. Provide an account as to why this occurred as such.
7. The Agency has received your response letter dated August 6, 1997, referencing Area of Concern number 11 of the January 1997 Compliance Evaluation Inspection. Although the manifests were completed in accordance with Illinois and Michigan regulations, the State of Texas requirements for generators of hazardous waste mandate a waste code number on the manifest. This information should be provided and entered in Block J of the EPA form 8700-22 (Uniform Hazardous Waste Manifest) to differentiate between hazardous waste generated at HRI versus hazardous waste trans-shipments. Distinguishing the waste generator is pertinent in completing the annual waste generators report.

Mr. Mike Sanderock
August 15, 1997
Page 6

8. During the site inspection on July 2, 1997, at the Transfer Facility, a 55-gallon waste drum with no waste labels to identify the waste as hazardous or non-hazardous was discovered. The waste drum had a product label, but according to Mr. Lynn Crane, the drum was identified as a waste container awaiting proper disposal. On July 8, 1997, Mr Crane provided Uniform Hazardous Waste Manifest #01408428 which included the waste container in question and indicated that the waste was a non-hazardous combustible liquid containing methoxy methyl butanol generated at the IBM Corporation facility in Austin, Texas. Mr. Crane requested that the transfer facility be re-inspected to verify the proper labeling of the waste drum. It was revealed that all the waste within the Transfer Facility (trailer) had been shipped off-site for disposal. If the contents of drum were not known on the day the labels were discovered missing, how could HRI determine what the contents were. Please provide documentation describing how the contents of the waste drum was determined and verify that the drum was properly labeled prior to disposal.

TNRCC REG. NO. 31905
INSPECTION DATE 28 July 1997

TANKS TABLE (Page 1 of 2)

(●) Tk Fac Status	Tk Cap	Tk Identify	NOR Fac	Location	New or Exist. Tk	Date put into Svc	Waste Handled (NOR Waste stream #)
						Date due 2d Cont.	Violation of Rules, list with Section & Q 3 only
P	19774	T-1	03	TANK FARM	NEW	APR 89	HW Derived Fuel
P	19774	T-2	04	TANK FARM	NEW	APR 89	HW Derived Fuel
P	19774	T-3	05	TANK FARM	NEW	APR 89	HW Derived Fuel
P	10132	T-4	06	TANK FARM	NEW	APR 89	HW Derived Fuel
P	10132	T-5	07	TANK FARM	NEW	APR 89	Paint / Thinner
P	10132	T-6	08	TANK FARM	NEW	APR 89	Solvent / Paint
P	3856	T-7	09	TANK FARM	NEW	APR 89	Alcohol
P	3856	T-8	10	TANK FARM	NEW	APR 89	Solvents
P	3856	T-9	11	TANK FARM	NEW	APR 89	Freon / 1,1,1-trichloroethane
P	3856	T-10	012	TANK FARM	NEW	APR 89	Freon / 1,1,1-trichloroethane
P	8813	T-11	013	TANK FARM	NEW	APR 89	Process Water / Waste Fuel
P	7000	T-13	016	TANK FARM	NEW	APR 89	Kiln Fuel
P	7000	T-14	017	TANK FARM	NEW	APR 89	Kiln Fuel
P	7000	T-15	018	TANK FARM	NEW	APR 89	Kiln Fuel
P	19774	T-27	019	TANK FARM	NEW	APR 89	Stormwater

NOTE: ● Identify tanks as to Facility status, i.e. P-permitted, Interim status, E- exempt 90-day storage, S-small quantity generator, and NH-nonhazardous.

[illegible]

NOTE: ☒ Waste turns up to facility status, i.e. P-permitted, I-interim status, E-exempt 90-day storage, G-small quantity generator, and NH-nonhazardous



Texas Natural Resource
Conservation Commission
Austin, Texas

PERMIT FOR INDUSTRIAL SOLID
WASTE MANAGEMENT SITE issued
under provisions of TEXAS HEALTH AND
SAFETY CODE ANN.
Chapter 361 (Vernon)

PERMIT NO. HW-50294-001

EPA PERMIT NO. TXD 052649027-1

This permit supersedes and
replaces permit No. HW-
50294-001, approved July
6, 1992.

Name of Permittee:

Hydrocarbon Recyclers of San Antonio
d.b.a. USPCI
4303 Profit Drive
San Antonio, Texas 78219

Site Owner:

USPCI, Inc.
515 W. Greens Rd., Suite 500
Houston, Texas 78219

Registered Agent for Service:

C.T. Corporation
350 N. St. Paul Street
Dallas, Texas 75201

Classification of Site:

Class I Hazardous Waste, Class I
Industrial Solid Waste
Off-site Storage and Processing

The permittee is authorized to store and process wastes in accordance with
regulations, requirements and other conditions set forth herein. This permit is
granted subject to the rules of the Texas Natural Resource Conservation
Commission, TNRCC, and other Orders of the TNRCC, and laws of the State of Texas.
This permit will be valid until canceled, amended, modified or revoked by the
Commission, except that the authorization to store and process wastes shall
expire midnight, July 6, 2002.

All provisions in this permit stem from State and/or Federal authority. Those
provisions marked with an asterisk (*) stem from Federal authority and will
implement the applicable requirements of HSWA for which the Texas Natural
Resource Conservation Commission has not been authorized.

Attachment 1 Page 1 of 35
Subject: Hydrocarbon Recyclers, Inc. 4303
Profit Drive San Antonio, TX Bexar County
TNRCC SWR #31905 EPA #TXD052649027
Compliance Evaluation Inspection of 3-6
February 1997.

ISSUED DATE MAR 11 1994

ATTEST

Gloria A. Carquez

Anthony C. Guey
For The Commission

PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME USPTI

CONTINUATION SHEET 2 OF 28

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PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME USPCI

CONTINUATION SHEET 3 OF 28

I. Size and Location of Facility

- A. The industrial solid waste management facility is located at 4303 Profit Drive, in the City of San Antonio, Bexar County, Texas, in the drainage area of Segment 1901 in the San Antonio River Basin (North Latitude 29°26'33", West Longitude 98°24'33").
- B. The legal description of the site submitted in the permit application dated November 7, 1988 is hereby made a part of this permit as "Attachment A".

II. Units and Operations Authorized

A. Wastes Authorized:

The permittee is authorized to manage industrial solid wastes listed in the application as described herein, subject to the limitations provided herein.

Hazardous wastes are limited as follows:

1. Hazard Code groups as prescribed by the U.S. Environmental Protection Agency regulations in effect upon the date of permit approval:

<u>X</u> Ignitable Waste I	<u>X</u> Acute Hazardous Waste (H)
<u>X</u> Toxic Waste T	<u>X</u> EP Toxic Waste Toxicity Characteristic (E)
<u>X</u> Corrosive Waste C	<u>X</u> Reactive Waste R

Waste Descriptions	TNRCC Waste Class	Hazard Codes
a. Blended waste-derived fuel	IH	I, T, C, E, R
b. Waste oil	IH, I	I, T, C, E, R, H
c. Waste solvents	IH	I, C, E, R, T
d. Waste paint and thinners	IH, I	I, C, E, R, T
e. Waste alcohols	IH	I, C, E, R, T
f. Waste halogenated solvents	IH	I, T, C, E, R
g. Contaminated process water and contaminated stormwater	IH, I	I, T, C, E, R, H
h. Corrosives	IH	C
i. Contaminated sludges, solids, and soils	IH	I, T, C, E, R, H
j. Reactive wastes	IH	R
k. Materials for incineration	IH, I	I, T, C, E, H
l. Brokered materials	IH, I	I, T, C, E, H, R

PERMIT NO. HW-S0294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME USPOI

CONTINUATION SHEET 4 OF 18

III A.

3. Prohibited Wastes:

- a. Polychlorinated biphenyls (PCBs) which are subject to regulations issued pursuant to the Toxic Substance Control Act (TSCA) (40 CFR Part 261.3);
- b. Radioactive or nuclear waste material (i.e., waste material which emits ionizing radiation spontaneously);
- c. Explosive material as defined by the Department of Transportation (DOT) under 49 CFR Part 173; and
- d. The following wastes listed under 40 CFR Part 261.31: F020, F021, F022, F023, F026, and F027.

4. Prior to accepting any additional waste with chemical characteristics similar to those authorized by Provision II.A.2., the permittee shall:

- a. Notify the Executive Director;
- b. Provide a characterization of the waste demonstrating its similarity;
- c. Submit, upon request of the Executive Director, such information as may reasonably be required to enable the Executive Director to ascertain the waste similarity; and
- d. Receive written authorization of the Executive Director.

B. Facilities and Functions Authorized:

The permittee is authorized to operate the following facility units and perform the following functions for storage and processing, subject to the limitations as described below. All waste management activities are to be confined to the authorized facility units except as otherwise exempted from permitting under Title 30 Texas Administrative Code (TAC) Chapter 135. All authorized facility units shall hereinafter be identified as numbered below (e.g., "Permit Unit No. ____");

1. Tank, cone fixed roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T1 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-f.
2. Tank, cone fixed roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T2 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-f.
3. Tank, cone fixed roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T3 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-f.

PERMIT NO. HW-50394-001
 EPA PERMIT NO. TXD 090649027-1
 NAME USPTC

CONTINUATION SHEET 5 OF 28

II B

4. Tank, cone fixed roof, cone bottom, 10,132 gallons capacity, 10 foot diameter, 18 foot height, carbon steel, above grade, identified as tank T4 in the permit application for storage and processing of wastes described in Provisions II.A.2.a.-f.
5. Tank, cone fixed roof, cone bottom, 10,132 gallons, 10 foot diameter, 18 foot height, carbon steel, above grade, identified as tank T5 in the permit application, for storage and processing of wastes described in Provisions II.A.2.d.
6. Tank, cone fixed roof, cone bottom, 10,132 gallons, 10 foot diameter, 18 foot height, carbon steel, above grade, identified as tank T6 in the permit application, for storage and processing of wastes described in Provision II.A.2.c.-d.
7. Tank, cone fixed roof, cone bottom, 3,856 gallons, 6 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T7 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c. and e.-g.
8. Tank, cone fixed roof, cone bottom, 3,856 gallons, 6 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T8 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c. and e.-g.
9. Tank, cone fixed roof, cone bottom, 3,856 gallons, 5 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T9 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c. and e.-g.
10. Tank, cone fixed roof, cone bottom, 3,856 gallons, 6 foot diameter, 18.5 foot height, carbon steel, above grade, identified as tank T10 in the permit application for storage and processing of wastes described in Provisions II.A.2.a.-c. and e.-g.
11. Tank, flat fixed roof, cone bottom, 8,913 gallons, 10 foot diameter, 16 foot height, carbon steel, above grade, identified as tank T11 in the permit application, for storage and processing of wastes described in Provisions II.A.2.a.-c. and g.-h.
12. Tank, 24,000 gallons, carbon steel, above grade, identified as tank T12 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c.-f.
13. Tank, cone fixed roof, cone bottom, 7,000 gallons, 7 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T13 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c.-f.
14. Tank, cone fixed roof, cone bottom, 7,000 gallons, 7 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T14 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c.-f.

PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME: USPOI

CONTINUATION SHEET 6 OF 28

III.B.

15. Tank, cone fixed roof, cone bottom, 7,000 gallons, 7 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T15 in the permit application, for storage and processing of wastes described in Provisions II.A.2.c-f.
 16. Tank, open roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T27 in the permit application, for storage and processing of wastes described in Provisions II.A.2.g.
 17. Tank, open roof, cone bottom, 19,774 gallons, 12 foot diameter, 24 foot height, carbon steel, above grade, identified as tank T28 in the permit application, for storage and processing of wastes described in Provisions II.A.2.g.
 18. Tank, 165 gallons, stainless steel, above grade, identified as tank T54 in the permit application for storage of wastes described in Provision II.A.2.a-1, k, and l.
 19. Tank, 650 gallons, aluminum, above grade, identified as tank T82 in the permit application, for storage of wastes described in Provisions II.A.2.g, e-g.
 20. Container storage area, maximum storage capacity of 1,108 55-gallon drum equivalents 60,940 gallons, for storage and processing of all authorized wastes.
 21. Tank, 350 gallons, carbon steel, above grade, identified as T-52 in the permit application, for processing of wastes described in Provision II.A.2.a-f.
- C. Authorization to operate this facility is contingent upon maintenance of financial assurance pursuant to Provision IV.A. and liability insurance requirements pursuant to Provision III.B.12. Authorization to begin operation of new or modified facility units is contingent upon compliance with Provisions IV.A. and V.C. Permittee may not store or process waste unless compliant with all financial assurance and liability requirements, which shall include all related financial assurance insurance instruments being in full force and effect.
- D. The facility units and operational methods authorized are limited to those described herein and by the following application submittals:
 July 29, 1988 - A revised Part A Application requesting expansion under Interim Status;
 November 7, 1988 - The initial Part B Application;
 November 16, 1988 - A revised Part A application including Waste Oil;
 November 21, 1989 - Technical Notice of Deficiency response including Parts A and B materials;
 June 20, 1990 - Revision of Part A to include U359 in the waste listing;
 August 1, 1990 - Revision of Part A tables III-1 and III-2, and page 2 of the Part B application;
 October 22, 1990 - Comments on Initial Draft Permit and Revised Part A application;
 October 25, 1990, - revisions to Part A application;
 December 20, 1990 - Revised listing of proposed tank contents;

Attachment 1
 Page 6 of 35
 Subject: Hydrocarbon Recyclers, Inc. 4303
 Profit Drive San Antonio, TX Bexar County
 TNRCC SWR #31905 EPA #TXD052649027
 Compliance Evaluation Inspection of 3-6
 February 1997.

PERMIT NO. HW-50294-001
 EPA PERMIT NO. TXD 052649027-1
 NAME: USPCI

CONTINUATION SHEET 7 OF 28

(II.D.)

February 6, 1991 - Revised Waste Analysis Plan and revised Part A application;
 March 21, 1991 - Revisions to Waste Analysis Plan;
 April 4, 1991 - A revised Waste Analysis Plan;
 June 7, 1991 - Tank T-52 permit amendment;
 May 6, 1993 - Tank T-52 Administrative NOD response;
 August 25, 1993 - Additional information and drawings of T-52; and
 September 29, 1993 - Errata sheet for August 25, 1993 submittal; and
 December 2, 1993 - Waste Analysis Plan changes.

Submittals to the TNRCC Office of Air Quality are listed in Provision IX.16. All facility units and operational methods are subject to the terms and conditions of this permit and TNRCC Rules. Prior to constructing or operating any facility unit in a manner which differs from the related plans and specifications, the permittee is required to:

1. Notify the TNRCC and submit plans and specifications for the proposed modifications; and
 2. Receive written authorization from the Executive Director.
- B. Any proposed facility modification, addition of units, or expansion in capacity which has not been addressed by the terms of this permit must be authorized in accordance with TNRCC amendment rules.

III. Facilities Design, Construction, and Operation

A. General Design, Construction, and Operation Requirements:

1. Facility design, construction, and operation shall comply with this permit and TNRCC rules and be in accordance with all plans and specifications for design, construction and operation approved by the terms of this permit. All plans and specifications for design, construction, and operation submitted with the permit application submittals noted in Provision II.D, are approved, subject to the terms of this permit and any other orders of the Texas Natural Resource Conservation Commission.
2. The entire waste management facility shall be designed, constructed, operated, and maintained to prevent inundation of and discharges from the areas surrounding the facility units authorized by Provision II.B., subject to the following requirements. Each storage and processing area, including unloading areas, shall be provided with a drainage control system which will collect spills and incident precipitation in such a manner as to:
 - a. Preclude the release from the system of any collected spills, leaks, or precipitation, except as provided in Provision III.B.3. This requirement shall be met by, at a minimum, providing a base and sides which are free of cracks or gaps severe enough to provide loss of containment and are sufficiently impervious to contain leaks, spills, or precipitation until the collected material is removed, and

Attachment 1 Page 7 of 35
 Subject: Hydrocarbon Recyclers, Inc. 4103
 Profit Drive San Antonio, TX Bexar County
 TNRCC SWR #31905 EPA #TXD052649027
 Compliance Evaluation Inspection of 3-6
 February 1997.



October 21, 1996

CERTIFIED MAIL NO. Z 255 848 452
RETURN RECEIPT REQUESTED

Texas Natural Resource Conservation Commission
Waste Evaluation Section
P.O. Box 13087
Austin, Texas 78711-3087

Re: Hydrocarbon Recyclers, Inc. (HRI)
dba USPCI/Laidlaw
TNRCC Registration Number 31905
EPA Facility I.D. No. TXD 052649027-1
Amendment of the Notice of Registration

Dear Sirs:

HRI requests its Notice of Registration (NOR) be amended. This amendment is necessary to correct errors which were found in the NOR dated June 5, 1996. Two types of amendments are to be made: modifications and corrections. The three modifications amend the NOR per the attached documentation. The seventeen corrections amend the NOR for which documentation was previously submitted and the information was input incorrectly.

MODIFICATIONS

The three modifications are listed below. Related documentation is presented in Appendix A.

- Convert the six digit waste code, 952670, to the eight digit waste code, 0020204H.
- Change the status of the six digit waste code, 917070, from active to inactive.
- Change the toxicity of waste stream 0017319H from D001 to D009. HRI inadvertently listed D001 as the waste code. The correct waste code is D009.

CORRECTIONS

Corrections are presented in Table I below. The corrections have been segregated according to waste streams and waste management units.

Attachment 19 Page 7 of 43
Subject: Hydrocarbon Recyclers, Inc. 4303
Profit Drive San Antonio, TX Bexar County
TNRCC SWR #31905 EPA #TXD052649027
Compliance Evaluation Inspection of 3-6
February 1997.

Table I
Description of NOR Corrections


Waste Codes	
Waste Code	Corrections to be Made
103540	Change to 00101011
906990	Change to 0007101H and 0008113H
951870	Change to 0004204H
978500	Change to 0005301H
984670	Change to 0009404H
Waste Management Units (WMUs)	
WMUs	Description of Correction to be Made
001	Change the 10/1/80 status date to 6/3/94.
002	Change status from closure pending to closed.
003	Change status from closed to active.
004	Change status from closed to active.
008	Change status from closed to active.
010	Change status from closed to active.
011	Change status from closed to active.
012	Change status from closed to active.
013	Change status from closed to active.
014	Change status from closed to active.
023	Change status from closed to active.
024	Change status from closed to active.

- The five waste codes listed on the above table were previously converted to eight digit waste codes. The results of the conversions are documented by their listings under the new waste codes on pages 2 through 5 of the June 5, 1996 NOR.
- A copy of the TNRCC letter documenting closure of waste management unit 002 is presented in Appendix B.
- It appears there was some confusion concerning the following waste management unit numbers: 003, 004, 008, 010, 011, 012, 013, 014, 023 and 024. The storage tanks associated with each of these unit numbers are active tanks at this facility. The letter in Appendix B documents the closure of tanks which resulted when HRI dba USPCI purchased this facility from KDM, the former company, in 1988. The tanks that were closed were owned by KDM. The tanks associated with the above waste management units were new tanks when they were installed.

The results of the amendments requested in this correspondence will correct the NOR so it accurately presents the information related to this facility.

If you have any questions or comments, feel free to contact Lynn Crane of this office at (210) 304-3000. A detailed, corrected NOR will be forwarded in the near future under separate cover. Your efforts expediting this matter are greatly appreciated.

Respectfully,



Michael S. Sanderock
Facility Manager

cc: Tim Kent, Laidlaw Environmental Services
Phyllis Primrose, TNRCC Region 13
Lynn Crane, USPCI/Laidlaw

file: tnrcc\norchng.ltr

Attachment 19 Page 9 of 43
Subject: Hydromarion Recyclers, Inc. 4303
Profit Drive San Antonio, TX Bexar County
TNRCC SWR #31905 EPA #TXD052649027
Compliance Evaluation Inspection of 3-6
February 1997.

TO: JEFFIE BARBEE

Region : 13

MAIL CODE 174

Inspector : MAF

FACILITY INFORMATION

SW ID : 31905

EPA ID : D052649027

Permit # : 50294

Facility Type : TS

EPA TYPE : TS

Facility Name : USPCI

Facility mailing address : 4303 PROFIT DR., SAN ANTONIO 78219

Facility physical address : 4303 PROFIT DR., SAN ANTONIO 78219

STRATEGY

S1 :

S2 :

S3 :X

S4 :

S5 :

S6 :

S7 :

INSPECTION INFORMATION

InspType :CEI

Insp begin date :1/20/98

Insp end date :1/28/98

Report Date :5/28/98

Super Sign : 5/28/98

UIC Violation :

UIC Violation Resolution Date :

EPA Quarter : 2

Comments :Report late due to major fire and bankruptcy issues at National Foam Cushion. Also major bankruptcy issues at Standard Industries.

COMPLIANCE INFORMATION

Verbal :

Verbal Compliance :

Date NOV : 5/28/98

Date NOV resp due : 6/28/98

Date NOV resp rec :

ENFORCEMENT INFORMATION

Date screening requested :

VSS # :

Date RIO :

Date Screening :

PEER REVIEW INFORMATION

1st peer rev : 5/26/98

1st return : 5/26/98

1st reviewer :CEM

2nd peer review : 5/27/98

2nd return : 5/28/98

2nd reviewer :CEM

3rd peer review : 5/28/98

3rd return :

3rd reviewer :CEM

CENTRAL OFFICE

Date Q/A :

IHW Reports should be placed in the following order:

CMEL

Inspection cover page

NOV or Compliance Letter

IOM

Inspection checklists

Other supporting documentation

Multi-media tracking form

IHW change form

Waste minimization form

If a case is being submitted for enforcement, place the EAR between the CMEL and the Inspection cover page.

Date RCVD :

TNRCC FY '97 RCRIS COMPLIANCE MONITORING & ENFORCEMENT LOG (CMEL)

TNRCC # **31905** EPA ID # **TXD052649027**

TNRCC Permit # **50294**

Date manager signed inspection report **05/28/98** Page **1** of **1**

Handler Name **LADLAW ENVIRONMENTAL SERVICES (SAN ANTONIO), INC**

Inspector/Coordinator **MAF**

County **Bexar**

Region **13**

Mailing Address **4303 PROBIT DRIVE, SAN ANTONIO, TX** Zip **78219**

Site Address **4303 PROBIT DRIVE, SAN ANTONIO, TX** Zip **78219**

- ☒ Compliance status verified in RCRIS by Inspector/Coordinator
- ☐ No further action required at this time (FYI - CR Files)
- ☒ Appropriate action taken by the Regional Office
- ☐ Additional information for an enforcement case
- ☐ This facility is not required by TNRCC rule to register
- ☐ Referral for ESC review VSS: _____ ESC: _____
- ☐ Refer to clearing house committee
- ☐ Central Office QA/QC reviewer: _____ Date: _____

*INSPECTION TYPE: **CEI**

CEI = CEI
MMC = Multi-Media
SPL = Sampling
NRR = Record Review
CME = CME
CSE = Follow Up
CDI = Case Development
OAM = O&M
OTH = Other Inspection Types

*Specify inspection reason, if applicable

*INSPECTION REASON:

06 = Closure Inspection
22 = Report Sampling Results
34 = UIC Inspection
40 = BIF Inspection
46 = Dept. of Defense
61 = State Inspection
63 = US/Mexico Border

FACILITY STATUS:

NH CE-SQG < 100 CE-SQG > 100
CE-SQG SOG **LOG** **TS**
LD **TRP** UNK INACTIVE

AREAS OF EVALUATION: (Circle ALL Areas Evaluated During This Inspection!)

GMP = Generator - Manifest
GOB = Generator - Other
GLB = Generator - Land Ban
DCL = TSD - Closure
DFA = TSD - Financial
DMR = TSD - Manifest
DOH = TSD - Other
DLB = TSD - Land Ban
TMR = Transporter - Manifest
TOR = Transporter - Other

DGW = TSD - Groundwater
SWR = TNRCC ISW State Rule Only
SMB = TNRCC ISW State Manifest Requirement Only
SGW = TNRCC ISW State Groundwater Contamination
UIC = Underground Injection Control
PER = TNRCC Permit Provisions
CAS = Permit or Order Schedules

SNC / SV

FEA = Penalties
WFS = Waste Fees

Inspection Dates:

SEQ #

1/20/98 (begin)
1/28/98 (end)

NOTE: Current Inspection Refers To Previous

(Inspection Type/Inspection Reason)

of _____ (Original inspection END date)

SPL Date:

SPL Results Rcvd:

I&HW CENTRAL OFFICE USE ONLY:

CMEL logged in: _____

Returned to FOD: _____

Reason: _____

RCRIS data entry: _____

Quality check: _____

Paradox data entry: _____

VIOLATIONS — Please reference instructions on back!

1. STATUS	2. PREVIOUS INSPECTION DATA			3. VIOLATION		4. RULE CITATION				5. ENFORCEMENT			6. COMPLIANCE STATUS		
NEW (N) SAME (S) RESOLVED (R)	RCRIS VIOLATION SEQUENCE #	INSP. TYPE	INSPECTION END DATE	AREA	CLASS	REG TYPE S/F	#	TNRCC STATE RULE	EPA FEDERAL RULE MIRROR PROVISION	P	ESC	TYPE ACTION	DATE ISSUED ENFORCEMENT ACTION	FINAL SCHEDULE DATE	ACTUAL DATE OF COMPLIANCE
N S A	42	CEI	970702	SWR	1 2 3	S F	1	335.6(c)							
R S R				SWR	1 2 3	S F	2	335.6(c)				120	970815	980104	970918
R S R				PER	1 2 3	S R	3	P.P. II. B / 335.4(c)	270.1(c)			120	980528	980727	
R S R				PER	1 2 3	S R	4	P.P. VI. C / 335.152(a)	270.42			120	980528	980727	
R S R				DOR	1 2 3	S R	5	335.152(a)(i)	264.15(d)			120	980528	980727	
R S R				SMR	1 2 3	S F	6	335.10(b)(8)				120	950528	980727	



PERMIT NO. HW-50294-001
EPA ID. NO. TXD 052649027-1
ISWR NO. 31905

Texas Commission on
Environmental Quality
Austin, Texas

PERMIT FOR INDUSTRIAL SOLID
WASTE MANAGEMENT SITE issued
under provisions of TEXAS HEALTH AND
SAFETY CODE ANN.
Chapter 361 (Vernon)

Name of Permittee:	Disposal Properties, LLC 4303 Profit Drive San Antonio Texas 78219
Site Owner:	Disposal Properties, LLC 4303 Profit Drive San Antonio Texas 78219
Registered Agent for Service:	C. T. Corporation 350 N. St. Paul Street Dallas Texas 75201
Classification of Site:	Hazardous and Nonhazardous Industrial Solid Waste Storage and Processing, Off-site, Commercial

The permittee is authorized to manage wastes in accordance with the limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store and process wastes shall expire midnight, 10 years after the date of renewal permit approval. This permit was originally issued on July 6, 1992.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of HSWA for which the Texas Commission on Environmental Quality has not been authorized. Those provisions marked with a double asterisk (**) stem from federal authority only.

ISSUED: **MAR 18 2004**

A handwritten signature in cursive script, reading "Margaret Hoffman".

For The Commission

[IV.C.]

2. The permittee shall ensure that all waste analyses utilized for waste identification or verification have been performed in accordance with methods specified in the current editions of "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods", (SW-846), ASTM or other methods accepted by the TCEQ. The permittee shall have a QA/QC program that is consistent with EPA SW 846 and the TCEQ RCRA QAPP.

PERMIT SECTION V. AUTHORIZED UNITS AND OPERATIONS

A. AUTHORIZED UNITS

1. The permittee is authorized to operate the facility units listed in "Attachment D" for storage and processing subject to the limitations herein. All waste management activities not otherwise exempted from permitting under 30 Texas Administrative Code (TAC) Section 335.2 shall be confined to the authorized facility units listed in "Attachment D". References hereinafter in this permit to "TCEQ Permit Unit No. ____" shall be to the facility units listed in "Attachment D". All authorized units must be clearly identified as numbered in "Attachment D". These units must have signs indicating "TCEQ PERMIT UNIT NO. ____".
2. The permittee shall comply with 40 CFR 264.17, relating to general requirements for ignitable, reactive, or incompatible wastes.
3. The permittee shall prevent inundation of any permitted units and prevent any discharges of any waste or runoff of waste contaminated stormwater from permitted units. Additionally, each loading or unloading area, associated with a permitted hazardous or nonhazardous waste management unit, shall be provided with a drainage control system which will collect spills and precipitation in such a manner as to satisfy the following:
 - a. Preclude the release from the system of any collected spills, leaks or precipitation;
 - b. Minimize the amount of rainfall that is collected by the system; and
 - c. Prevent run-on into the system from other portions of the facility.
4. The permittee shall operate and maintain the facility to prevent washout of any hazardous waste by a 100-year flood, as required by 40 CFR 264.18(b)(1).

B. CONTAINER STORAGE AREAS

1. The permitted container storage area is shown in Table V.B. - Container Storage Areas. The permittee is authorized to operate the facility container storage area for storage and processing subject to the limitations contained herein.

[V.B.]

2. Containers holding hazardous waste shall be managed in accordance with 40 CFR 264.171, Condition of containers; 40 CFR 264.172, Compatibility of waste with containers; and 40 CFR 264.173, Management of containers.
3. The permittee shall construct and maintain the containment systems for the container storage areas in accordance with the drawings and details included in the Part B Application in Provision I.B. At a minimum, the containment system must meet the requirements of 40 CFR 264.175.

C. TANKS AND TANK SYSTEMS

1. The permitted tank unit and their approved waste types are shown in Table V.C. - Tanks and Tank Systems. The permittee is authorized to operate the permitted tank unit for storage and processing subject to the limitations contained herein.
2. The permittee shall not place hazardous waste or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. [40 CFR 264.194(a)]
3. The permittee shall prevent spills and overflows from the tank or containment system as per the requirements of 40 CFR 264.194(b).
4. Secondary containment systems must be provided with a leak-detection system that is operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours.
5. The permittee shall report to the Executive Director within 24 hours of detection when a leak or spill occurs from the tank system or secondary containment system to the environment. [40 CFR 264.196(d)(1)] (A leak or spill of one pound or less of hazardous waste that is immediately contained and cleaned-up need not be reported.) [40 CFR 264.196(d)(2)] (Releases that are contained within a secondary system need not be reported.)
6. Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the permittee shall report the following information to the Executive Director: [40 CFR 264.196(d)(3)]
 - a. Likely route of migration of the release;
 - b. Characteristics of the surrounding soil (including soil composition, geology, hydrology, and climate);

[V.C.6.]

- c. Results of any monitoring or sampling conducted in connection with the release. If the permittee finds it will be impossible to meet this time period, the permittee shall provide the Executive Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
 - d. Proximity of downgradient drinking water, surface water, and populated areas; and
 - e. Description of response actions taken or planned.
7. The permittee shall submit to the Executive Director all certifications of major repairs to correct leaks within seven days of returning the tank system to use. [40 CFR 264.196(f)]

D. SURFACE IMPOUNDMENTS (NOT APPLICABLE)

E. WASTE PILES (NOT APPLICABLE)

F. LAND TREATMENT UNITS (NOT APPLICABLE)

G. LANDFILLS (NOT APPLICABLE)

H. INCINERATORS (NOT APPLICABLE)

I. BOILERS (NOT APPLICABLE)

J. DRIP PADS (NOT APPLICABLE)

K. MISCELLANEOUS UNITS (NOT APPLICABLE)

L. CONTAINMENT BUILDINGS (NOT APPLICABLE)

PERMIT SECTION VI. GROUNDWATER DETECTION MONITORING (NOT APPLICABLE)

PERMIT SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

A. FACILITY CLOSURE

1. The permittee shall follow the closure plan, developed in accordance with 40 CFR Part 264 Subpart G, and contained in the permit application submittals identified in Provision I.B. (Incorporated Application Material) of this permit.

Additionally, facility closure shall also commence:

TABLE V.B CONTAINER STORAGE AREAS

<i>Unit No.</i>	<i>Container Storage Area</i>	<i>N.O.R. #</i>	<i>Rated Capacity</i>	<i>Dimensions</i>	<i>Containment Volume (including rainfall for unenclosed areas)</i>	<i>Unit will manage Ignitable,¹ Reactive,¹ or Incompatible² Waste (state all that apply)</i>
20	Container Storage Area	001	60,940 gallons	Approx. 18,183 sq. ft. 107'X205' irregular	Greater than 10% of rated capacity	Ignitable, reactive, incompatible waste

Containers managing ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line.

²Incompatible waste must be separated from other waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments by means of a dike, berm, wall, or other device.

Permit No. HW-50294-001
Permittee: Disposal Properties, LLC

Sheet 1 of 1

TABLE V.C. TANKS AND TANK SYSTEMS

<i>Unit No.</i>	<i>Tank</i>	<i>N.O.R. #</i>	<i>Storage and/or Processing</i>	<i>Waste No.s¹</i>	<i>Rated Capacity</i>	<i>Dimensions</i>	<i>Containment Volume (including rainfall for unenclosed areas)</i>	<i>Unit will manage Ignitable, Reactive, or Incompatible Waste (state all that apply)</i>
1	Tank T-1	003	Yes	001, 002, 003, and 004	Design: 20,000 gallons Operating volume: 19,774 gallons	Dia: 12 ft Ht: 24 ft Cone Bottom	58,412 gallons	Ignitable

¹from Table IV.B, first column

AUTHORIZED FACILITY UNITS

TCEQ Permit Unit No.	Unit Name	Unit Description	Capacity
001	Tank	Tank T-1	20,000 gallons
002	Tank	Tank T-2, Clean Closed 09/28/1999	
003	Tank	Tank T-3 Clean Closed 09/28/1999	
004	Tank	Tank T-4 Clean Closed 09/28/1999	
005	Tank	Tank T-5 Clean Closed 09/28/1999	
006	Tank	Tank T-6 Clean Closed 09/28/1999	
007	Tank	Tank T-7 Clean Closed 09/28/1999	
008	Tank	Tank T-8 Clean Closed 09/28/1999	
009	Tank	Tank T-9 Clean Closed 09/28/1999	
010	Tank	Tank T-10 Clean Closed 09/28/1999	
011	Tank	Tank T-11 Clean Closed 09/28/1999	
012	Tank	Tank T-12 Clean Closed 09/28/1999	
013	Tank	Tank T-13 Clean Closed 09/28/1999	
014	Tank	Tank T-14 Clean Closed 09/28/1999	
015	Tank	Tank T-15 Clean Closed 09/28/1999	
016	Tank	Tank T-16 Clean Closed 09/28/1999	
017	Tank	Tank T-17 Clean Closed 09/28/1999	
018	Tank	Tank T-18 Clean Closed 09/28/1999	
019	Tank	Tank T-19 Clean Closed 09/28/1999	
020	Container Storage Area	Container Storage Area	60,940 gallons
021	Tank	Tank T-21 Clean Closed 09/28/1999	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

IHW/31905/CO

RECEIVED
TNRCC IHW PERMITS

JUL 22 2004

WASTE PERMITS DIVISION

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. David Taylor
Compliance Manager
Clean Harbors
500 Battleground Road
La Porte, Texas 77571

RE: Joint RCRA Permit with both State and Federal Provisions for Disposal Properties, LLC., San Antonio, Texas, EPA Identification Number TXD052649027.

Dear Mr. Taylor:

On March 18, 2004, the Texas Commission on Environmental Quality (TCEQ) issued a final permit to your facility for hazardous waste processing and storage. All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of HSWA for which the TCEQ has not been authorized. Your permit included some waste codes for which TCEQ is not yet authorized to implement. Therefore, in order to have a fully effective permit renewal, the U.S. Environmental Protection Agency (EPA) must jointly issue an approval of this permit.

Based on the information provided and our understanding that no adverse public comments were received regarding the Federal provisions, EPA grants you the authority to manage the waste codes as stated in the permit, without any changes to the management practices of your previously permitted storage units. Please find enclosed a signature page that is a part of the joint permit. It should be noted that the renewal date will remain the same as the state issued portion of your permit.

In 40 CFR Part 124.19, the procedures for requesting that the EPA Administrator review permit decisions is described. Effective March 1, 1992, EPA changed jurisdiction over petitions for review from the Administrator to the Environmental Appeals Board. If you petition the Environmental Appeals Board for such a review, please send a copy of your petition to the Region 6 office.

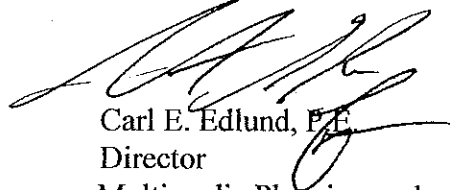
DUE DATE _____ DOC # 10553-1
WWCH 10692784
PM Bhakta
TEAM ☐ 1 ☐ 2 ☐ UIC

You should file permit appeals at the address listed below:

U.S. Environmental Protection Agency
Clerk of the Board, Environmental Appeals Board
Mail Code 1103B
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

If you have any questions, please contact Mr. Stephen A. Gilrein, P.E. at (214) 665-8179.

Sincerely yours,



Carl E. Edlund, P.E.
Director
Multimedia Planning and
Permitting Division

cc: Ms. Katherine Nelson, TCEQ

U. S. Environmental Protection Agency Signature Page for Joint Permit

FACILITY NAME: Disposal Properties, LLC

FACILITY ADDRESS: 4303 Profit Drive
San Antonio, Texas 78219

FACILITY I.D. NUMBER: EPA ID No. TXD052649027

FACILITY LOCATION: San Antonio in Bexar County, Texas
North Latitude 29°26'33", West Longitude 98°24'33"
Legal Description is "Attachment A" of permit.

PROPERTY OWNER: Disposal Properties, LLC
4303 Profit Drive
San Antonio, Texas 78219

FACILITY OPERATOR: Disposal Properties, LLC
4303 Profit Drive
San Antonio, Texas 78219

The State of Texas proposed the renewal of the permit for the above named facility on June 23, 2003. On March 18, 2004, the State issued the final Permit. Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, (42 USC 6901 *et seq.*), and regulations promulgated thereunder by the United States Environmental Protection Agency (U.S. EPA) codified in Title 40 of the Code of Federal Regulations (CFR). EPA, Region 6, is hereby issuing the Federal portion of this Joint Permit to the above owner/operator (hereafter called the Permittee), to manage and store the hazardous waste codes identified below at the location named herein.

- A. The facility is located in San Antonio in Bexar County, Texas, North Latitude 29°26'33", West Longitude 98°24'33". The Legal Description is "Attachment A" of permit.
- B. Disposal Properties, LLC. is a hazardous waste processing and storage facility. The facility has a RCRA Permit for all units listed in "Attachment D" and for the listed waste codes stated in Table IV.B. of this Permit.

More specific information on the hazardous waste and permitted treatment and storage conditions is found in the permit issued by the State of Texas on March 18, 2004.

The State of Texas has adopted the final Federal rules promulgated from July 1, 1995, to June 30, 2000 (RCRA Clusters VII-X) which includes the revisions to the Land Disposal Restrictions (LDR). In this permit the wastes codes D026, D028, F001-F005, F039, K024, K088, P127-P128, P185, P188, P191, P192, P194, P196-P199, P201-P205, U271, U280, U364, U367, U372-U373, U389, U394-U395, U404, U409, U410 and U411 are included in the LDR's but certain conditions pertaining to the waste codes are not authorized by EPA for the State to manage these wastes. The following are the Federal rules that include the above mentioned conditions regarding the wastes: 40 CFR 268.39(c); 40 CFR 268.40(g); 40 CFR 268.7; 40 CFR 268.40(j)/ table; 40 CFR 268.40 and 40 CFR 261.33. The reason the State of Texas is not authorized to manage these wastes is the result of EPA's withdrawal of the immediate final rule published on April 15, 2003. For implementation purposes, EPA has to oversee the management of these wastes until the State is authorized to do so.

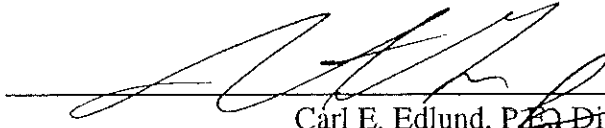
This RCRA Permit contains the effective Federal Permit Condition for these requirements, and the effective permit conditions for the requirements issued by the State of Texas RCRA program authorized under 40 CFR Part 271. When both portions of this RCRA Permit are effective, the Permittee is authorized to conduct hazardous waste management activities specified in this RCRA Permit.

The Permittee must comply with all terms and conditions of this Permit. This Permit consists of the conditions attached herein and the applicable regulations contained in 40 CFR Parts 260, 261, 264, 268, 270, 124 and HSWA, as specified in the Permit. Applicable regulations and provisions are those which are in effect on the date of issuance of the Permit in accordance with 40 CFR §270.32(c).

This Permit is based on the assumption that the information submitted in the Permit Application and any subsequent amendments (hereinafter referred to as the application) are accurate. Any inaccuracies found in this information may be grounds for the termination, revocation and reissuance or modification of this Permit (see 40 CFR §§ 270.41, 270.42 and 270.43) and potential enforcement actions. The Permittee must inform the U.S. EPA of any deviation from or changes in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This Permit shall remain in effect unless the permit is revoked and reissued under 40 CFR §270.41, terminated under 40 CFR §270.43, or continued in accordance with 40 CFR §270.51(a).

by



Carl E. Edlund, P.E., Director
Multimedia Permitting and
Planning Division 6PD

Texas Natural Resource Conservation Commission

Investigation Report

Safety-Kleen San Antonio, Inc.
TNRCC ID # 31905, EPA ID # TXD052649027,
Permit # HW-50294
IHW - Compliance Evaluation Investigation
Conducted November 14 and 30, 2001
Report Dated February 11, 2002

INTRODUCTION

On November 14, 2001, an Industrial and Hazardous Waste (IHW) Compliance Evaluation Inspection (CEI) was conducted at Safety-Kleen San Antonio, Inc., by Texas Natural Resource Conservation Commission (TNRCC) Region 13 representative Ms. Thea Smith. Safety-Kleen was represented by Mr. Mike Sanderock (Facility Manager), Mr. John Guzman (Field Services Manager), Mr. Dave Taylor (Safety-Kleen (La Porte) Environmental Compliance Manager), and Mr. Ricardo Saucedo (Safety-Kleen Systems, Inc., Senior Environment, Health and Safety Manager). The facility is located at 4303 Profit Drive, San Antonio (Bexar County), Texas (Attachment 2).

An exit meeting was conducted on November 30, 2001, by Thea Smith at the Safety-Kleen facility. One alleged violation of solid waste regulations identified during the site inspection was presented to Mr. Sanderock, Mr. Guzman, and Mr. Taylor; this alleged violation involved the proper labeling of universal waste containers. This violation was immediately resolved upon verbal notification to Mr. Guzman. Additionally, the writer requested additional information regarding the facility site activity reports, annual independent auditing, plans for permit renewal, and the facility waste minimization plan. Violations of the permit were presented and discussed for failure to perform annual audits and submit site activity reports. During the exit meeting, the writer gave Mr. Sanderock the inspection brochure entitled: "The TNRCC Has Inspected Your Business", the "Pollution Prevention Assistance" reference page, and a customer service survey (verification included as Attachment 37). The investigator's notes for the exit interview are included as Attachment 12; a sign in sheet for the meeting is included as Attachment 13.

GENERAL FACILITY AND WASTE PROCESS INFORMATION

Safety-Kleen operates a permitted hazardous waste treatment and storage facility located in east San Antonio. The hazardous waste permit (HW-50294) was issued to the facility on July 6, 1992 (Attachment 3). On-site disposal and recycling of hazardous wastes is no longer conducted at the facility. All waste received at the facility is shipped off-site to other authorized facilities and is

managed, while on site, as transfer facility waste. The facility is permitted to utilize both tanks and containers for the storage of waste. Safety-Kleen is registered as a large quantity industrial solid waste generator, transporter, and transfer facility under TNRCC SWR 31905. The company provides hazardous waste management and product supply services to various commercial industries.

At the time of this inspection, the facility's hazardous waste management operations consisted of the storage of a relatively small amount of off-site generated wastes and the storage of wastes from site generated wastes. Prior to the commencement of partial closure activities, the primary business of the facility had been solvent recovery and hazardous waste derived fuel blending. Previous inspection reports have included descriptions of the facility's waste management operations which were conducted up until the commencement of partial closure activities.

The facility's hazardous waste permit expires July 6, 2002. During the exit interview, the facility stated that they did not have intentions of renewing the permit, as Safety-Kleen has one other permitted facility in San Antonio. However, during a December telephone conversation with Mr. Sanderock, it was presented that Safety-Kleen would submit RCRA permit renewal. A copy of this renewal was delivered to the TNRCC San Antonio Region Office on January 7, 2002.

BACKGROUND

The Safety-Kleen facility was last inspected for compliance with RCRA Permit and generator requirements on April 7 and 19, 1999. As a result of the inspection, violations were identified and subsequently resolved. These violations were for: required aisle space in a transfer facility, open containers in a transfer facility, incomplete manifests, facility inspection requirements, and a closure requirement as listed in the facility's permit. Additionally, several Areas of Concern were noted during the inspection. The facility was sent a General Compliance letter dated June 3, 1999 (Attachment 14). A response to the letter was submitted by the facility on June 16, 1999 (Attachment 38). The outstanding concerns and actions taken to resolve them will be outlined in this report.

ADDITIONAL INFORMATION

Site Inspection

Photographs from the investigation are included as Attachment 10. Notes from the investigation are included as Attachment 11 (November 14, 2001) and Attachment 12 (November 30, 2001).

The loading dock is a covered area that was once used for receiving wastes and shipping products. The area is clean and no longer used for that purpose (Attachment 10, Photos Nos. 1 and 2). The tank farm has been removed except for 5 tanks; the tank farm is still surrounded by a secondary

containment system (Attachment 10, Photos Nos. 3 and 4). Four of the five remaining tanks have been closed; the remaining permitted tank is inactive (Attachment 10, Photo No. 5). Piping between the tanks and the fill stations has been disconnected and removed (Attachment 10, Photo No. 6). Pipe connections and valves are numbered and labeled (Attachment 10, Photo No. 8). The fill stations are in a covered area at the back of the facility (Attachment 10, Photo No. 10); the floor drain accumulated any spills that may have occurred. Any fluids in the floor drain could be removed and containerized or discharged to the sanitary sewer under the facility's discharge permit.

The facility maintains a vapor recovery unit onsite; the unit has been closed and is inactive (Attachment 10, Photo No. 7). The unit is currently available for sale by the facility. An onsite drainage system to the POTW has discoloration (Attachment 10, Photo No. 9). Facility representatives stated that this discharge point was to the sanitary sewer and is covered in their discharge permit. The source of the discharge was boiler blowdown; the boiler has been removed by the facility.

The facility has a container storage area (Attachment 10, Photo No. 12) and a satellite accumulation area (Attachment 10, Photo No. 11) onsite for wastes generated from spills, facility maintenance, and personal protective equipment from household hazardous waste cleanups and illegal drug lab cleanups. Four containers of facility generated waste were stored in the container storage area (Attachment 10, Photo No. 13); all containers of hazardous waste were properly labeled and dated. The former permitted container area is now used to store supplies and spill equipment for sale to industrial customers (Attachment 10, Photos Nos. 19 and 20).

Hazardous waste lamps are handled as universal waste onsite. The one container of universal waste was not labeled with an accumulation start date. This was presented as a violation of 30 Texas Administrative Code §335.261 and 40 Code of Federal Regulations §273.14(e); Mr. Guzman immediately wrote an accumulation start date on the container (Attachment 10, Photo No. 14). November 9, 2001, was the date listed as the accumulation start date.

The facility is currently operating a trailer as a 10 day transfer facility (Attachment 10, Photo No. 15). Six drums of hazardous and nonhazardous waste were stored inside the transfer facility during the site inspection (Attachment 10, Photo No. 16). Manifests for the transfer shipments were stored inside a lockbox at the facility (Attachment 10, Photo No. 17). The truck used for delivering shipments to this Safety-Kleen facility is maintained onsite (Attachment 10, Photo No. 18).

The permitted container storage area has a fire suppression unit as required in the facility permit (Attachment 10, Photos Nos. 21 and 22). The unit is tested annually to ensure safe and effective usage in the event of an emergency.

One tank labeled No. 27 and a condensing unit have been sold by Safety-Kleen to Wright Oil

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Company, SWR No. 69100, located at 4321 Profit Drive (Attachment 10, Photo No. 23). The unit was properly closed by Safety-Kleen prior to the sale.

The facility is complying with permit security requirements by maintaining a controlled access, properly labeled perimeter (Attachment 10, Photo No. 24).

Facility personnel complete daily and weekly site inspections; these inspections are documented into the facility operating log on inspection checklists (Attachment 15). One daily and weekly inspection checklist from October 2001 was copied during the inspection (Attachment 16). This checklist showed that there were no deficiencies documented at the site; this was supported by observations made during the site investigation.

Record Review

The Notice of Registration (Attachment 1) lists the facility as a Large Quantity Generator (LQG), Transporter, Receiver, and Transfer Facility. The EPA RCRAInfo Compliance Monitoring and Enforcement Violation Report (Attachment 4) indicated that Safety-Kleen is an LQG and a treatment/storage facility with several resolved violations as discussed in the Background section of this report. Safety-Kleen was inspected as an LQG, a permitted storage facility, a transporter, and a transfer facility.

Safety-Kleen submits their Annual Waste Summary via STEERS. Copies of the following Annual Waste Summaries (as reported to the TNRCC) are included with this report: 1999 (Attachment 5) and 2000 (Attachment 7). Waste shipment summaries from 1999, 2000, and 2001, show that the facility has greatly reduced the volume of waste both generated by and transporter through the facility since 1999 (Attachments 6, 8, and 9, respectively). Manifests and land disposal restriction notices were reviewed onsite; each was completed correctly.

Safety-Kleen is the contractor for the City of San Antonio Household Hazardous Waste Collection Center. Manifests are used for shipping the hazardous wastes to the designated facility. Manifest 02259672 was copied during the inspection to document manifesting concerns (Attachment 17). Box No. 1 is filled in with the word "EXEMPT" as opposed to the generator's EPA Id Number. Box B is filled with the word "XXX13" as opposed to the generator's solid waste registration number. Box I has waste codes beginning with the letters "HOUS" as opposed to a sequence of numbers designated by the generator. Completing manifests this way is consistent with household hazardous waste cleanups across the state.

The facility is required, by permit, to provide an annual activities report to both the TNRCC Central Office and the San Antonio Region Office. Copies of the 1999, 2000, and 2001 reports were not forwarded to the San Antonio Region office. This is in violation of Permit Provision III.B.4 / V.F. This was discussed during the exit interview portion of the investigation.

The facility is also required, by permit, to provide for an annual independent environmental audit of the facility. Documentation was requested during the exit interview regarding the last annual audit. Mr. Sanderock stated that the last outside audit was performed in 1999. Pursuant to Permit Provision III.B.13, the facility will need to begin providing annual facility audits.

Safety-Kleen had financial assurance bonds issued by Frontier Insurance Company. Effective May 31, 2000, the U.S. Department of the Treasury removed Frontier Insurance Company from the Circular 570. Safety-Kleen Systems, Inc. was required to acquire alternate forms of financial assurance (Attachment 19). Failure to have adequate financial assurance is in violation of the facility's hazardous waste permit. Documentation provided to the investigator during the Safety-Kleen Systems Inc., (SWR 69048) investigation on September 6, 2000, certified liability insurance coverage for the Safety-Kleen - Profit Drive, San Antonio facility (Attachment 20). For the 1999 closure cost estimate, the 1998 closure cost estimate was increased by 1%. This is an inadequate inflation adjustment. The TNRCC Financial Assurance Section issued a Notice of Enforcement to Safety-Kleen Corporation on September 7, 2000 (Attachment 21). The TNRCC Central Office handled all financial assurance issues concerning Safety-Kleen Corporation and Safety-Kleen Systems, Inc.

Safety-Kleen maintains hazardous waste training records for each employee. This training involves a computer based training program, classroom instruction, and on-the-job training. Annual reviews of hazardous waste procedures are conducted by the Region Senior Environment, Health and Safety Manager.

As an LQG and as part of the hazardous waste permit, Safety-Kleen is required to maintain a waste minimization plan. The facility did not have a waste minimization plan onsite during the record review portion of the investigation. However, a Source Reduction and Waste Minimization Annual Progress Report to the San Antonio Water System was provided to show that waste minimization has been reviewed and implemented (Attachment 18). Pursuant to Permit Provision V.J., an annual certification reviewing waste minimization plans and accomplishments must be submitted to the TNRCC; this was not done. A Waste Minimization Checklist was completed by the investigator after the inspection (Attachment 36).

Safety-Kleen also maintains a contingency plan and emergency procedures. This contingency plan has been forwarded to local authorities who would respond to an emergency at the facility. A list of emergency contacts is also maintained; this list is updated through the permit modification process. A copy of this list was posted at the front door and by facility telephones.

Permit Modifications

Safety-Kleen was issued a hazardous waste permit on July 6, 1992 (Attachment 3). Permit

modifications, since the last industrial and hazardous waste inspection, are summarized below:

On September 15, 1999, the facility submitted a permit modification to change administrative information, including emergency contact phone numbers, for the facility (Attachment 22); this modification was approved on September 27, 1999 (Attachment 23). On November 11, 1999, the facility submitted a permit modification to change administrative information, including emergency contact phone numbers, for the facility (Attachment 24).

On December 6, 1999, Safety-Kleen submitted a class 2 permit modification to the TNRCC Permits Section (Attachment 25). A request was made to delete nineteen tank units from the permit and add one new tank system to the permit. The new tank system was to be operated as a return and fill station. This permit modification request and all attached materials are stored in the TNRCC Central Records and the TNRCC San Antonio Region Office. A Technical Notice of Deficiency regarding the class 2 modification was sent to the facility on December 30, 1999 (Attachment 26). The modification request was subsequently withdrawn by the facility (Attachment 27).

On November 15, 2000, the facility submitted a permit modification to change administrative information, including emergency contact phone numbers, for the facility (Attachment 28); this modification was approved on December 11, 2000 (Attachment 29).

Facility Closure Status

The facility has proceeded with partial facility closure by closing eighteen of the permitted hazardous waste tanks. A closure plan modification report was submitted by the facility, and subsequently approved, on April 16, 1999. A Closure Certification Report was submitted to the TNRCC in June 1999. These documents are included as attachments with the 1999 Compliance Evaluation Inspection. On July 8, 1999, the TNRCC responded to the certification report listing deficiencies (Attachment 30). The deficiencies included: incorrect closure plan used to write certification, include list of closing units, address tank T12 (never constructed), identify appropriate closure standard, include all chemicals in wipe test analyses, and certification statement not correct. Safety-Kleen submitted a response to the deficiencies on July 26, 1999 (Attachment 31). Additional information was again requested by the TNRCC on August 23, 1999 (Attachment 32). These results were provided to the TNRCC on September 7, 1999 (Attachment 33). Partial facility closure was accepted and conveyed to the facility on September 28, 1999 (Attachment 34). This did not include the tank farm secondary containment, one permitted hazardous waste tank, and the permitted container storage area. Other permit exempt tanks (solid waste management units 024 and 026) and container storage areas (solid waste management units 022 and 027) remain active on the facility's notice of registration. One other permit exempt tank (solid waste management unit 023) is listed as "inactive" on the notice of registration.

A concern was raised during the 1999 Compliance Evaluation Inspection regarding the decommissioning of all ancillary equipment; this concern was listed in the June 3, 1999 Compliance Letter to the facility. Ancillary equipment was to be disconnected from the tanks prior to the cleaning of the tank interior; however, during the 1999 inspection, it was noted that the piping remained in place after tank decontamination. The facility submitted certification to the TNRCC on December 13, 1999, which states that ancillary piping was emptied and steam cleaned (Attachment 35). The concern, as listed in the 1999 Inspection Report was resolved based upon this submittal.

Surrounding Land Use

The facility is located at 4303 Profit Drive, San Antonio, Bexar County, Texas. The property and building are owned by Safety-Kleen San Antonio, Inc. The surrounding land is used for commercial and industrial business. Water is received from and wastewaters discharged to the San Antonio Water System (SAWS), a publicly-owned treatment works (POTW), under Industrial Wastewater Permit No. MIS-0001. Drainage is to the San Antonio River in the San Antonio River Basin Segment #1911 (Segment Identification Maps for Texas Rivers and Coastal Basins LP 85-01).

SUMMARY OF OUTSTANDING ALLEGED VIOLATIONS

During the November 2001 Compliance Evaluation Investigation, conditions were observed and documented that constitute violations of the solid waste rules. The following areas of alleged violation were observed and have not yet been corrected by Safety-Kleen:

1. Permit Provision III.B.4 / V.F. - Annual Site Activity Report

“The annual site activity report required by 30 TAC 335.71 shall be submitted to the TNRCC Central Office and the Region 13 Office in San Antonio by January 25 of each year for the preceding year’s activities. This annual report shall include, at a minimum, the following information:

- a. All information and records required by 30 TAC Section 335.154;
2. Volume of all wastes and contaminated liquid stored and processed at the site;
3. Summary of the major areas of construction and expansion of the facility during the year’
4. Summary of the annual cost estimate adjustments for facility closure; and
5. Certification of waste minimization in accordance with Provision VI.I.”

“An annual report must be submitted by January 25 covering facility activities during the previous year.”

The facility is required, by permit, to provide an annual activities report to both the TNRCC Central Office and the San Antonio Region Office. Copies of the 1999, 2000, and 2001 reports were not forwarded to the San Antonio Region office. This is in violation of Permit Provision III.B.4 / V.F. The facility will need to submit copies of these reports, or a negative report if no activity took place during any year, to the TNRCC San Antonio Region Office to resolve this violation.

2. Permit Provision III.B.13 - Annual Independent Environmental Audit

“The permittee shall provide for an annual independent environmental audit of the permitted facility. The permittee shall meet the requirements of 30 TAC 305.147(1)-(8). The results of each annual independent environmental audit shall be submitted to the Executive Director and mailed to affected persons prior to issuance of the notice for the subsequent annual independent environmental audit.”

Safety-Kleen is required, by permit, to provide for an annual independent environmental audit of the facility. Documentation was requested during the exit interview regarding the last annual audit. Mr. Sanderock stated that the last outside audit was performed in 1999. Pursuant to Permit Provision III.B.13, the facility will need to begin providing annual facility audits. Notice must be given to the TNRCC of the upcoming audit, and the results of the audit must be submitted to the TNRCC.

3. Permit Provision V.J. - Waste Minimization

“The permittee shall certify annually by January 25 for the previous year that the permittee

1. has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the permittee’s facility operation to the degree determined to be economically practicable;
2. That the proposed method of treatment, storage, or disposal is that economically practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment. The waste minimization certification is to be included in the operating records submitted with the Annual Report required by Provision V.F. and submitted biannually to the EPA Region VI Office.”

As an LQG and as part of the hazardous waste permit, Safety-Kleen is required to maintain a waste minimization plan. The facility did not have a waste minimization plan onsite during the record review portion of the investigation. However, a Source Reduction and Waste Minimization Annual Progress Report to the San Antonio Water System was provided to show that waste minimization has been reviewed and

implemented. Pursuant to Permit Provision V.J., an annual certification reviewing waste minimization plans and accomplishments must be submitted to the TNRCC; this was not done. The facility will need to submit their 1999, 2000 and 2001 waste minimization certifications to the TNRCC San Antonio Region Office to resolve this violation.

SUMMARY OF RESOLVED ALLEGED VIOLATIONS

During the November 2001 Compliance Evaluation Investigation, conditions were observed and documented that constitute violations of the solid waste rules. The following areas of alleged violation were observed, but were immediately corrected by Safety-Kleen:

1. 30 Texas Administrative Code §335.261 / 40 Code of Federal Regulations §273.15(c)(1) - Universal Waste Rule

“A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

- (1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;”

Hazardous waste lamps are handled as universal waste onsite. The one container of universal waste was not labeled with an accumulation start date. This was presented as a violation of 30 Texas Administrative Code §335.261 and 40 Code of Federal Regulations §273.15(c)(1); Mr. Guzman immediately wrote an accumulation start date on the container. November 9, 2001, was the date listed as the accumulation start date. This violation was issued and resolved on November 14, 2001.

RESOLVED AREA OF CONCERN FROM THE 2001 INVESTIGATION

The following concern was presented to Safety-Kleen during the exit interview and additional information will be provided to the facility in the Notice of Violation letter:

- A. Manifests for HHW - Safety-Kleen is the contractor for the City of San Antonio Household Hazardous Waste Collection Center. Manifests are used for shipping the hazardous wastes to the designated facility. Manifests 02259672 was copied during the inspection to document manifesting concerns (Attachment 17). Box No. 1 is filled in with the word “EXEMPT” as opposed to the generator’s EPA Id Number. Box B is filled with the word “XXX13” as opposed to the generator’s solid waste registration number. Box I has waste**

codes beginning with the letters "HOUS" as opposed to a sequence of numbers designated by the generator.

Following the November 14, 2001, investigation, discussions with Ingrid Dierlam of the TNRCC Small Business and Assistance Program regarding proper manifesting of household hazardous waste collected wastes revealed that "HOUS", "EXEMPT", and "XXX13" were the appropriate entries for Boxes I, 1, and B on each hazardous waste manifest. The concerns of Field Investigator Thea Smith are therefore resolved. Safety-Kleen has been completing the household hazardous waste manifests properly; completing manifests this way is consistent with household hazardous waste cleanups across the state.

RESOLVED AREAS OF CONCERN FROM THE 1999 INVESTIGATION

During the 1999 Compliance Evaluation Investigation, concerns were identified during the investigation that warranted additional attention by the facility. Below is a listing of each concern, the original wording from the Summary of Outstanding Alleged Violations (including attachments referenced in the 1999 inspection report), and a description of any actions taken by the facility to address the concern. The letter below corresponds to the original numbering in the Notice of Violation letter.

- A. Storage and Closure Activities** - During the current inspection, some concerns were raised due to observations of the facility's permitted waste storage activities and the closure activities which were being conducted in the permitted container storage area (Permit Unit No. 20).
- (1) With regard to the activities of hazardous waste storage in "Section A" of Permit Unit No. 20, the "acid bay" and "caustic bay" provided in this area for segregation of incompatible wastes (as per Permit Provision III.D.5.) were noted to have been in use for activities other than the storage of hazardous wastes in containers. The "acid bay" was observed to hold empty containers while other containers labeled to hold corrosive wastes (acids) were observed in the general container storage area, and the "caustic bay" was observed to be used as an equipment staging area for the pressure washing of "Section B". Since containers of incompatible wastes were not observed to be managed in the general container storage area, no violation of 40 CFR § 264.177(c) (relating to Special requirements for incompatible wastes) has been alleged; however, the San Antonio Regional Office is concerned that the facility operators allowed the storage areas provided for segregation of incompatible wastes to be occupied by the facility's other operational activities.
 - (2) With regard to the management of containers in "Section A", on April 7, 1999 a metal 55-gallon drum was observed to have been placed in storage while covered

with a crust of dried residues, presumably a result of the waste accumulation activities. This drum of hazardous waste was noted to have been generated that same day by the on-site tank decontamination activities ("RCRA drummed sludge [flammable] - paint solids/tank bottoms"). Upon identification of this container the facility operators cleaned the waste residues from the outside of the container, thereby effectively resolving the immediate concerns. The San Antonio Regional Office is concerned that this drum was allowed to have been transferred into the permitted container storage area in a condition which not only could pose a threat of discharge of waste residues to the environment and those who handled it, but which also could be indistinguishable from a leaking drum when inspected.

- (3) With regard to the decontamination of the floor in "Section B", two issues were noted on April 7, 1999: a small discharge of black tarry residue was observed on the floor near the center of the section; and the recently conducted pressure washing activities had deposited a noticeable residue on the floor in the "caustic bay". At that time, the facility operators could not explain the origin of the small black tarry substance. Either this substance had been discharged after the pressure washing activities, or it had not been removed in the recently conducted decontamination activities. As for the residues on the floor of the "caustic bay" which were attributed to the decontamination activities, the San Antonio Regional Office noted that there appeared to have been no precautions taken to prevent discharges to the outside of the building from overspraying and/or air-borne dispersion of mists created by the pressure washing activity. It is noted that the storage building is open-sided to a height of approximately ten (10) feet and that there are no precautions in the approved closure plan for preventing discharges during decontamination of the container storage area containment structures. Because the facility is closing "Section B" of Permit Unit No. 20 without removing the associated containment structures as would be required in the act of final facility closure, the San Antonio Regional Office is uncertain as to how this issue will be addressed if closure certification is provided without verification of the soil conditions adjacent to the structure. At this time, the San Antonio Regional Office is uncertain as to how the facility operators will address these issues under the facility's current partial closure activities.

During the 2001 investigation, Safety-Kleen was not operating as an active storage facility. There was no sign that acidic or caustic wastes were stored in inappropriate areas. All containers in the storage area (facility generated waste) were in good condition. The concern of overspray onto the native soils had not been addressed. The facility submitted a written response after the 1999 inspection and addressed each concern listed in the general compliance letter. In response to section (1) of this concern, Safety-Kleen stated that wastes were not commingled during cleaning

operations, though some drums were rearranged in the container storage area. Safety-Kleen also stated that this was in the normal course of business and is not normal operating procedures for the storage of wastes. In response to section (2) of this concern, the identified drum was immediately cleaned of all waste residues. In response to section (3) of this concern, the facility decided that the container storage area would not be included with any of the partial closure activities. Upon full facility closure, the potential soil contamination would be addressed. Based upon the actions taken by the facility regarding these issues, this concern is resolved.

- B. Manifests Associated with Rejected Loads** - During the review of the facility's manifesting records for off-site shipments of waste from the facility, additional concerns were noted regarding the hazardous waste shipments that are also addressed above in Violation No. 2. These concerns regarded the reported transfer of the waste to a Burlington Northern Railroad bulk container at a transfer facility which was reportedly located in Texas and the return shipment of quantities of each waste shipment which were not transferred to the railcar. If the transfer of the waste did take place inside the state of Texas, then the State Transporter's ID for the Burlington Northern Railroad (83329) should have been added to box E of each manifest. With regard to the return shipments of waste "rejected" in the transfer, it is noted that the Safety-Kleen (San Antonio), Inc. facility operators had indicated in the September 11, 1998 response letter that a standard operating procedure (SOP) would be followed for rejected loads. That SOP had stated that the transporter's manifest would be used in the return transportation of the rejected quantity of waste and, upon receipt of the shipment back at the facility, the manifest would be signed and dated in the discrepancy space. Copies of this manifest would then be maintained "with the Outbound Manifest and into the Permanent Incoming files." These copies of the transporter's manifests were not found in the files with the "Outbound Manifest" for these shipments. It is noted that the conversion of the facility operations to those of a Safety-Kleen branch office are expected to eliminate these types of issues in the future. At this time, the San Antonio Regional Office anticipates no further action with regard to the issue of rejected loads.

In the facility's June 16, 1999, response letter, corrected copies of manifests were submitted to the TNRCC San Antonio Region Office. The State transporter registration number was added to Box E of each manifest. Additionally, the facility stated that they would maintain copies of the transporter's manifests with the Outbound Manifest files. Based upon documentation submitted by the facility, this concern is resolved.

- C. Decommissioning of Ancillary Equipment** - As noted above in Violation No. 4, the activities of partial closure which were observed during this inspection did not appear to conform with those specified in the closure plan. The actions taken by the facility operators

to modify the closure plan apparently have effectively resolved the issue of the alleged violation; however, as a result of these changes to the closure plan, the San Antonio Regional Office is unsure as to how and when the ancillary piping will be decontaminated. This concern was raised due to the observation that the ancillary piping remained connected to the tanks after the tanks had been decontaminated. Based upon the closure schedule, the ancillary equipment was to have been disconnected from the tanks prior to the cleaning of the tank interior. Following the investigator's verbal notification of a potential violation, the changes made to the closure plan indicated that "all dates are approximate and may be adjusted as necessary due to field conditions." These changes have apparently released the facility operators from adherence to any sequence of proposed activities for closure. The San Antonio Regional Office acknowledges that the facility operators are conducting closure activities in a manner so as to leave their options open with regard to the future use of some of the tanks as part of the Safety-Kleen branch office operations. These circumstances have resulted in conditions which leaves the San Antonio Regional Office unsure whether the actions taken by the facility operators will be satisfactory for closure of the tank systems. These concerns will again be evaluated upon receipt of closure documentation for the activities which have been conducted.

A concern was raised during the 1999 Compliance Evaluation Inspection regarding the decommissioning of all ancillary equipment; this concern was listed in the June 3, 1999 Compliance Letter to the facility. Ancillary equipment was to be disconnected from the tanks prior to the cleaning of the tank interior; however, during the 1999 inspection, it was noted that the piping remained in place after tank decontamination. The facility submitted certification to the TNRCC on December 13, 1999, which states that ancillary piping was emptied and steam cleaned. The concern, as listed in the 1999 Inspection Report was resolved based upon this submittal.

- D. Transfer Operations** - On April 7, 1999, the trailer unit which has been operated as a transfer facility since 1996 was observed to have been relocated from the west side of the storage building to the loading dock at the northeast corner of the storage building. This new location is also identified as a solid waste management unit on the NOR (unit no. 027). It is noted that the use of a trailer for the transfer facility storage activity allows the transfer facility operations to be easily relocated at the site. According to Mr. Kent, the Profit Drive facility's conversion to Safety-Kleen branch office activities will include the relocation of the transfer facility's storage activities to Section B of Permit Unit No. 20 (container storage area), and NOR unit no. 027 (process pad) is to be converted to a "return and fill" area under the branch office activities. During this inspection, the miscellaneous equipment observed stored in this area included an old drum extruder that was being held at the outside edge of the concreted area and which appeared to have dried residues remaining on the piston of the extruder. In order to properly address the issues raised concerning the transfer facility and

NOR unit no. 027, the San Antonio Regional Office notes that the facility operators need to ensure that the facility is compliant with the requirements of 30 TEX. ADMIN. CODE § 335.8 (relating to Closure) with regard to the former locations of the transfer facility operations and the conversion of the site operations to those of a branch office.

The transfer facility operations continue to utilize a trailer for storage. The trailer is still located in the northeast corner of the facility. In the June 16, 1999, response letter, Safety-Kleen noted that the concerns regarding the previous locations and related closure of the transfer facility had been noted. Based upon the notification that the transfer facility would be incorporated into the facility closure plan, this concern is resolved.

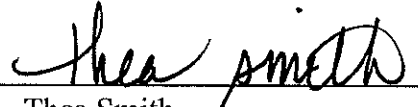
- E. During the review of facility records, a work order (no. 1625) was noted which specified remedial actions to be taken to address a "stain (which) goes from dock ramp to operations area." According to Mr. Kent, this stain had resulted from a small spill (less than one quart) of tetrachloroethylene which had impacted both asphalt and soils and which had occurred during an act of transporting a drum of waste solvent from Permit Unit No. 20 to the operations area for recycling. At the time of this inspection, no additional documentation was provided to substantiate the facility's claims regarding the source, quantity, or identity of the material that was the subject of the work order; nor did the facility records include documentation that the impacted areas had been properly remediated. It is noted that, if the spill had been less than one quart of tetrachloroethylene, the facility was not obligated to have reported the spill to the TNRCC; however, the spill must still be addressed in accordance with 30 TEX. ADMIN. CODE § 327.5 (relating to Actions Required) and the issue of the release must be addressed when the facility undergoes closure of the units associated with the spill event. Since the facility is in the process of closing Section B of Permit Unit No. 20 (container storage area), it is expected that the closure activities will address the issues of spills and releases to the environment which have occurred in association with the waste management activities conducted at the site.

In the June 16, 1999, response letter, Safety-Kleen noted that the spill had been entered in the Site Operating Record and would be addressed during final facility closure. Additionally, the facility is not closing the container storage area, so the spill has not been addressed. With the notification that the spill would be incorporated into the closure plan, this concern is resolved.

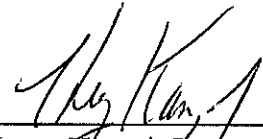
Safety-Kleen San Antonio, Inc. - San Antonio
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CONCLUSION

This investigation was conducted for Safety-Kleen San Antonio, Inc., which operates as a hazardous waste storage and transfer facility, hazardous waste transporter, and a large quantity generator. Safety-Kleen will be sent a Notice of Violation letter dated February 11, 2002, documenting the outstanding and resolved violations, areas of concern, and actions taken as listed above. A response to the violations has been requested by March 11, 2002.

Signed 
Thea Smith
Environmental Investigator
Region 13 / San Antonio

February 11, 2002
Date

Approved 
Henry Karnei, Jr.
Waste Section Manager
Region 13 / San Antonio

2-11-02
Date

Attachments: (in order of final report submittal)

- ☒ Data Entry Form/CMEL
- ☐ Enforcement Action Request (EAR)
- ☒ Letter to Facility: NOV
- ☐ Inspection Report
- ☐ Summary of Inspection Findings table
- ☐ CME Checklist
- ☐ UIC Self Reported Data Records Review
- ☐ Sample Analysis Results
- ☒ Manifests
- ☒ NOR

- ☒ Maps, Plans, Sketches
- ☒ Photographs
- ☐ Container Storage Area Table
- ☐ Tanks Table
- ☒ Correspondence from the facility
- ☒ Other (specify): See List of Attachments.
- ☒ Waste Minimization Checklist
- ☐ Multi-media Tracking Form
- ☐ IHW Change Form

Report run on: December 22, 2005 1:34 PM

1992 HSWA NO CA
2004 HSWA NOT APPL

DISPOSAL PROPERTIES LLC				TEXAS				TXD052649027							
SAN ANTONIO, BEXAR COUNTY								REGION 06							
Universes Generator: SQG Transporter: X Full Enforcement: ---ST Operating TSDF: ---ST BOYSNC: SNC: Annual BOY Enf: X Subj CA: X Subj CA TSD 3004: X Subj CA TSD Discr: Subj CA Non-TSD: CA Wrkld: X Perm Prgrs: ---ST Perm Wrkld: ---ST Clos Wrkld: ---- Pclos Wrkld: ---- Op Pmt GPRA: X+ PClos GPRA: CA GPRA: CA HE EI: CA GW EI:															
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Unit Name		Seq.		Process Code / Legal and Operating Status / Notes		# Units		Capacity		UOM		Effective Date			
STORE TANKS		5-1		TANK STORAGE Interim Status - Inactive/closing, But Not Yet Rcra Closed Notes: TANKS 3,4,8,10-14,23-30,33-35& 5 300 GALLON TANKS		24		1.00		Gal		07/11/1989			
Event		Owner		Event Seq.		Resp. Agcy		Act. Loc.		Actual Date		Sched. Orig.		Sched. New	
CL370YE		HQ		1		STATE		TX		08/21/1995					
Description: RECEIVE CLOSURE CERTIFICATION-ACCORDING TO PLAN															
CL360MO		HQ		1		STATE		TX		07/19/1989					
Description: PLAN APPROVED - CLOSURE-PARTIAL CLOSURE															
CL310		HQ		1		STATE		TX		07/11/1989					
Description: PLAN RECEIVED - CLOSURE															
Notes: 24 HW STORAGE TANKS															
Unit Name		Seq.		Process Code / Legal and Operating Status / Notes		# Units		Capacity		UOM		Effective Date			
STORE TANKS		5-2		TANK STORAGE Interim Status - Clean Closed Notes: TANKS 3,4,8,10-14,23-30,33-35 & 5 300 GALLON TANKS		24		1.00		Gal		09/21/1995			
Event		Owner		Event Seq.		Resp. Agcy		Act. Loc.		Actual Date		Sched. Orig.		Sched. New	
CL380CA		HQ		1		STATE		TX		09/21/1995					
Description: CLOSURE VERIFICATION															
Series Name		Seq.													
APP03		3													
Unit Name		Seq.		Process Code / Legal and Operating Status / Notes		# Units		Capacity		UOM		Effective Date			
T-52		1-1		TANK TREATMENT Interim Status - Operating, Actively Managing Rcra-regulated Waste		1		350.00		Gal/Day		04/29/1988			
Event		Owner		Event Seq.		Resp. Agcy		Act. Loc.		Actual Date		Sched. Orig.		Sched. New	
OP160DP		HQ		1		STATE		TX		01/04/1994					
Description: PUBLIC NOTICE-DRAFT PERMIT ISSUED															
Notes: MAJOR AMENDMENT/ADD TANK T-52															
OP485		TX		1		STATE		TX		12/22/1993					
Description: FINAL DRAFT TO CHIEF CLERK															
Notes: MAJOR AMENDMENT/ADD TANK T-52															
OP150		US		1		STATE		TX		05/10/1993					
Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE															
Notes: MAJOR AMENDMENT/ADD TANK T-52															
OP230AP		US		1		STATE		TX		06/06/1991					
Description: MODIFICATION REQUESTED-ADDITIONAL PROCESS															
Notes: MAJOR AMENDMENT/ADD TANK T-52															
OP231MJ		US		1		STATE		TX		06/06/1991					
Description: CLASS DETERMINATION-MAJOR (OLD CLASSIFICATION)															
Notes: MAJOR AMENDMENT/ADD TANK T-52															
Unit Name		Seq.		Process Code / Legal and Operating Status / Notes		# Units		Capacity		UOM		Effective Date			
T-52		1-2		TANK TREATMENT Permitted - Operating, Actively Managing Rcra-regulated Waste		1		350.00		Gal/Day		03/11/1994			
Event		Owner		Event Seq.		Resp. Agcy		Act. Loc.		Actual Date		Sched. Orig.		Sched. New	
OP240AP		US		1		STATE		TX		03/11/1994					
Description: MODIFICATION DETERMINATION-ADDITIONAL PROCESS															
Notes: MAJOR AMENDMENT/ADD TANK T-52															
OP242SI		US		1		STATE		TX		03/11/1994					
Description: SIGNIFICANCE DETERMINATION-SIGNIFICANT															
Notes: MAJOR AMENDMENT/ADD TANK T-52															

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DISPOSAL PROPERTIES LLC - continued							TXD052649027	
Series Name		Seq.						
APP04		4						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T54 & T82	3-1	TANK STORAGE Interim Status - Operating, Actively Managing Rcra-regulated Waste Notes: T54=165G, T82=650G	2	815.00	Gal	04/29/1988		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CL310	HQ	1	STATE	TX	11/07/1988			
Description: PLAN RECEIVED - CLOSURE Notes: T54 & T82								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T54 & T82	3-2	TANK STORAGE Permitted - Operating, Actively Managing Rcra-regulated Waste Notes: T54=165G, T82=650G	2	815.00	Gal	07/06/1992		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CL340	US	1	STATE	TX	01/01/1998			
Description: PUBLIC NOTICE - CLOSURE								
CL360	HQ	1	STATE	TX	07/06/1992			
Description: PLAN APPROVED - CLOSURE								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T54 & T82	3-3	TANK STORAGE Permitted - Inactive/closing, But Not Yet Rcra Closed Notes: T54=165G & T82=650G	2	815.00	Gal	01/01/1998		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CL370YE	HQ	1	STATE	TX	07/09/1998			
Description: RECEIVE CLOSURE CERTIFICATION-ACCORDING TO PLAN								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T54 & T82	3-4	TANK STORAGE Permitted - Clean Closed Notes: T54=165G; T82=650G	2	815.00	Gal	09/28/1999		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CL380CA	HQ	1	STATE	TX	09/28/1999			
Description: CLOSURE VERIFICATION Notes: T54 & T82								
Series Name		Seq.						
APP05		5						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T-52	1-1	TANK TREATMENT Interim Status - Operating, Actively Managing Rcra-regulated Waste	1	350.00	Gal/Day	04/29/1988		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CL310	HQ	1	STATE	TX	11/07/1988			
Description: PLAN RECEIVED - CLOSURE Notes: T52								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T-52	1-2	TANK TREATMENT Permitted - Operating, Actively Managing Rcra-regulated Waste	1	350.00	Gal/Day	03/11/1994		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CL360	HQ	1	STATE	TX	03/11/1994			
Description: PLAN APPROVED - CLOSURE								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T-52	1-3	TANK TREATMENT Permitted - Inactive/closing, But Not Yet Rcra Closed	1	350.00	Gal/Day	01/23/1998		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
CL370YE	HQ	1	STATE	TX	07/09/1998			

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DISPOSAL PROPERTIES LLC - continued									
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Series Name	Seq.								
APP05	5								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date			
T-52		Event Owner Event Seq. Resp. Agcy Act.Loc. Actual Date Sched. Orig. Sched. New							
		1 STATE Description: RECEIVE CLOSURE CERTIFICATION-ACCORDING TO PLAN CL340 US 1 STATE TX 01/23/1998 Description: PUBLIC NOTICE - CLOSURE							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date			
T-52	1-4	TANK TREATMENT Permitted - Clean Closed	1	350.00	Gal/Day	09/28/1999			
		Event Owner Event Seq. Resp. Agcy Act.Loc. Actual Date Sched. Orig. Sched. New							
		CL380CA HQ 1 STATE TX 09/28/1999 Description: CLOSURE VERIFICATION Notes: T52							
Series Name	Seq.								
APP06	6								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date			
TREAT TANKS	4-1	TANK TREATMENT Interim Status - Operating, Actively Managing Rcra-regulated Waste Notes: T2-T3=19774GEACH,T4-T6=10132GEACH,T7-T10=3856GEACH,T11=8813G,T12=24000G T13-T15=7000GEACH,T27-T28=19774GEACH	16	178,699.00	Gal/Day	04/29/1988			
		Event Owner Event Seq. Resp. Agcy Act.Loc. Actual Date Sched. Orig. Sched. New							
		CL310 HQ 1 STATE TX 11/07/1988 Description: PLAN RECEIVED - CLOSURE Notes: TREAT TANKS							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date			
TREAT TANKS	4-2	TANK TREATMENT Permitted - Operating, Actively Managing Rcra-regulated Waste Notes: T2-T3=19774GEACH,T4-T6=10132GEACH,T7-T10=3856GEACH,T11=8813G,T12=24000G T13-T15=7000GEACH,T27-T28=19774GEACH	16	178,699.00	Gal/Day	07/06/1992			
		Event Owner Event Seq. Resp. Agcy Act.Loc. Actual Date Sched. Orig. Sched. New							
		CL370YE HQ 1 STATE TX 06/08/1999 Description: RECEIVE CLOSURE CERTIFICATION-ACCORDING TO PLAN CL360 HQ 1 STATE TX 07/06/1992 Description: PLAN APPROVED - CLOSURE							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date			
TREAT TANKS	4-3	TANK TREATMENT Permitted - Clean Closed Notes: T2-T3=19774GEACH,T4-T6=10132GEACH,T7-T10=3856GEACH,T11=8813G,T12=24000G, T13-T15=7000GEACH,T27-T28=19774GEACH	16	178,699.00	Gal/Day	09/28/1999			
		Event Owner Event Seq. Resp. Agcy Act.Loc. Actual Date Sched. Orig. Sched. New							
		CL380CA HQ 1 STATE TX 09/28/1999 Description: CLOSURE VERIFICATION Notes: TREAT TANKS							
Series Name	Seq.								
PERMIT	1								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date			
T-52	1-1	TANK TREATMENT Interim Status - Operating, Actively Managing Rcra-regulated Waste	1	350.00	Gal/Day	04/29/1988			
		Event Owner Event Seq. Resp. Agcy Act.Loc. Actual Date Sched. Orig. Sched. New							
		OP2400H US 6 STATE TX 12/13/1994 Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW Notes: CLASS 1 MOD OP010 HQ 1 STATE TX 04/29/1988 Description: PART B CALL-IN							

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DISPOSAL PROPERTIES LLC - continued						TXD052649027	
Series Name	Seq.						
PERMIT	1						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date	
T-52	1-2	TANK TREATMENT Permitted - Operating, Actively Managing Rcra-regulated Waste	1	350.00	Gal/Day	03/11/1994	
Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New
OP240OH	US	14	STATE	TX	05/11/1998		
Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/TYPO ERRORS							
OP242NS	US	14	STATE	TX	05/11/1998		
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
Notes: CLASS 1 MOD/TYPO ERRORS							
OP230OH	US	15	STATE	TX	03/20/1998		
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/TYPO ERRORS							
OP23110	US	15	STATE	TX	03/20/1998		
Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
Notes: CLASS 1 MOD/TYPO ERRORS							
OP240OH	US	13	STATE	TX	02/19/1998		
Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/NAME CHANGE							
OP242NS	US	13	STATE	TX	02/19/1998		
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
Notes: CLASS 1 MOD/NAME CHANGE							
OP240OH	US	12	STATE	TX	02/13/1998		
Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP242NS	US	12	STATE	TX	02/13/1998		
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP230OH	US	13	STATE	TX	01/16/1998		
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP23110	US	13	STATE	TX	01/16/1998		
Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP240OH	US	11	STATE	TX	12/15/1997		
Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/UPGRADE TANK T-52							
OP242NS	US	11	STATE	TX	12/15/1997		
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
Notes: CLASS 1 MOD/UPGRADE TANK T-52							
OP230OH	US	12	STATE	TX	08/22/1997		
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/UPGRADE TANK T-52							
OP23110	US	12	STATE	TX	08/22/1997		
Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
Notes: CLASS 1 MOD/UPGRADE TANK T-52							
OP230OH	US	14	STATE	TX	07/28/1997		
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/NAME CHANGE							
OP23110	US	14	STATE	TX	07/28/1997		
Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
Notes: CLASS 1 MOD/NAME CHANGE							
OP240OH	US	10	STATE	TX	03/20/1997		
Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP242NS	US	10	STATE	TX	03/20/1997		
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP230OH	US	11	STATE	TX	02/18/1997		
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP23110	US	11	STATE	TX	02/18/1997		
Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN							
OP240RW	US	3	STATE	TX	02/03/1997		
Description: MODIFICATION DETERMINATION-REQUEST WITHDRAWN							
Notes: CLASS 2 MOD REQUESTED 11/20/95 WITHDRAWN							
OP242NS	US	3	STATE	TX	02/03/1997		
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
Notes: CLASS 2 MOD REQUESTED 11/20/95 WITHDRAWN							

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DISPOSAL PROPERTIES LLC - continued										TXD052649027
Series Name		Seq.								
PERMIT		1								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date	
T-52		Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
		OP240OH	US	9	STATE	TX	10/29/1996			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	9	STATE	TX	10/29/1996			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP230OH	US	10	STATE	TX	10/14/1996			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	10	STATE	TX	10/14/1996			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP240OH	US	8	STATE	TX	01/23/1996			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	8	STATE	TX	01/23/1996			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP230OH	US	3	STATE	TX	11/20/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 2 MOD								
		OP230OH	US	8	STATE	TX	11/20/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 2 MOD/CHANGE WAP								
		OP23120	US	3	STATE	TX	11/20/1995			
		Description: CLASS DETERMINATION-CLASS 2 MOD								
		Notes: CLASS 2 MOD								
		OP23120	US	8	STATE	TX	11/20/1995			
		Description: CLASS DETERMINATION-CLASS 2 MOD								
		Notes: CLASS 2 MOD/CHANGE WAP								
		OP230OH	US	9	STATE	TX	10/31/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	9	STATE	TX	10/31/1995			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP240OH	US	7	STATE	TX	06/22/1995			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP242NS	US	7	STATE	TX	06/22/1995			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP230OH	US	7	STATE	TX	04/10/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP23110	US	7	STATE	TX	04/10/1995			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP230OH	US	6	STATE	TX	12/13/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP23110	US	6	STATE	TX	12/13/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD								
		OP242NS	US	6	STATE	TX	12/13/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD								
		OP240OH	US	5	STATE	TX	10/21/1994			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP242NS	US	5	STATE	TX	10/21/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP230OH	US	5	STATE	TX	07/08/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP23111	US	5	STATE	TX	07/08/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED								

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Series Name	Seq.
PERMIT	1

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
T-52		Event Owner Event Seq. Resp. Agcy Act. Loc. Actual Date Sched. Orig. Sched. New				
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE				
		OP2400H US 4 STATE TX 04/18/1994				
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW				
		Notes: CLASS 1 MOD				
		OP242NS US 4 STATE TX 04/18/1994				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT				
		Notes: CLASS 1 MOD				
		OP2300H US 4 STATE TX 04/12/1994				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW				
		Notes: CLASS 1 MOD				
		OP23110 US 4 STATE TX 04/12/1994				
		Description: CLASS DETERMINATION-CLASS 1 MOD, NO PRIOR APPROVAL REQUIRED				
		Notes: CLASS 1 MOD				

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
T-52	1-3	TANK TREATMENT Permitted - Inactive/closing, But Not Yet Rcrs Closed	1	350.00	Gal/Day	01/23/1998
		Event Owner Event Seq. Resp. Agcy Act. Loc. Actual Date Sched. Orig. Sched. New				
		OP2400H US 16 STATE TX 02/15/1999				
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW				
		Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN				
		OP242NS US 16 STATE TX 02/15/1999				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT				
		Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN				
		OP2300H US 17 STATE TX 12/14/1998				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW				
		Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN				
		OP23111 US 17 STATE TX 12/14/1998				
		Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED				
		Notes: CLASS 1ED/REVISE CLOSURE PLAN				

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
CSA	2-1	CONTAINER Interim Status - Operating, Actively Managing Rcrs-regulated Waste	1	60,940.00	Gal	04/29/1988
		Event Owner Event Seq. Resp. Agcy Act. Loc. Actual Date Sched. Orig. Sched. New				
		OP485 TX 1 STATE TX 06/10/1991				
		Description: FINAL DRAFT TO CHIEF CLERK				
		OP160 US 1 STATE TX 06/04/1991				
		Description: PUBLIC NOTICE				
		OP484 TX 1 STATE TX 09/25/1990				
		Description: DRAFT PERMIT DISTRIBUTION				
		OP150 US 1 STATE TX 07/30/1989				
		Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE				
		OP020 US 1 STATE TX 11/07/1988				
		Description: PART B RECEIVED				
		OP010 HQ 1 STATE TX 04/29/1988				
		Description: PART B CALL-IN				

Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date
CSA	2-2	CONTAINER Permitted - Operating, Actively Managing Rcrs-regulated Waste	1	60,940.00	Gal	07/06/1992
		Event Owner Event Seq. Resp. Agcy Act. Loc. Actual Date Sched. Orig. Sched. New				
		OP270 HQ 1 STATE TX 07/16/2002				
		Description: PERMIT EXPIRES				
		OP2400H US 20 STATE TX 12/09/1999				
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW				
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN				
		OP242NS US 20 STATE TX 12/09/1999				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT				
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN				
		OP2300H US 21 STATE TX 11/11/1999				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW				
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN				

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DISPOSAL PROPERTIES LLC - continued										TXD052649027
Series Name	Seq.									
PERMIT	1									
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date	
CSA		Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New	
		OP23110	US	21	STATE	TX	11/11/1999			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2400H	US	19	STATE	TX	09/27/1999			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	19	STATE	TX	09/27/1999			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2300H	US	20	STATE	TX	09/15/1999			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	20	STATE	TX	09/15/1999			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2400H	US	17	STATE	TX	07/14/1999			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	17	STATE	TX	07/14/1999			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2300H	US	18	STATE	TX	06/24/1999			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	18	STATE	TX	06/24/1999			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2400H	US	18	STATE	TX	05/10/1999			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/MISC CHANGES								
		OP242NS	US	18	STATE	TX	05/10/1999			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1ED MOD/MISC CHANGES								
		OP2300H	US	19	STATE	TX	04/16/1999			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/MISC CHANGES								
		OP23111	US	19	STATE	TX	04/16/1999			
		Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1ED MOD/MISC CHANGES								
		OP2400H	US	16	STATE	TX	02/15/1999			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN								
		OP242NS	US	16	STATE	TX	02/15/1999			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN								
		OP2300H	US	17	STATE	TX	12/14/1998			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN								
		OP23111	US	17	STATE	TX	12/14/1998			
		Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1ED/REVISE CLOSURE PLAN								
		OP2400H	US	15	STATE	TX	10/22/1998			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP242NS	US	15	STATE	TX	10/22/1998			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP2300H	US	16	STATE	TX	07/08/1998			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP23110	US	16	STATE	TX	07/08/1998			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP2400H	US	14	STATE	TX	05/11/1998			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/TYPO ERRORS								
		OP242NS	US	14	STATE	TX	05/11/1998			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								

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DISPOSAL PROPERTIES LLC - continued										TXD052649027	
Series Name		Seq.									
PERMIT		1									
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date		
CSA	Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New			
	OP230OH	US	3	STATE	TX	11/20/1995					
	Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW										
	Notes: CLASS 2 MOD										
	OP230OH	US	8	STATE	TX	11/20/1995					
	Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW										
	Notes: CLASS 2 MOD/CHANGE WAP										
	OP23120	US	3	STATE	TX	11/20/1995					
	Description: CLASS DETERMINATION-CLASS 2 MOD										
	Notes: CLASS 2 MOD										
	OP23120	US	8	STATE	TX	11/20/1995					
	Description: CLASS DETERMINATION-CLASS 2 MOD										
	Notes: CLASS 2 MOD/CHANGE WAP										
	OP230OH	US	9	STATE	TX	10/31/1995					
	Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW										
	Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN										
	OP23110	US	9	STATE	TX	10/31/1995					
	Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED										
	Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN										
	OP240OH	US	7	STATE	TX	06/22/1995					
	Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW										
	Notes: CLASS 1 MOD/ADDITION OF 12 WASTES										
	OP242NS	US	7	STATE	TX	06/22/1995					
	Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT										
	Notes: CLASS 1 MOD/ADDITION OF 12 WASTES										
	OP230OH	US	7	STATE	TX	04/10/1995					
	Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW										
	Notes: CLASS 1 MOD/ADDITION OF 12 WASTES										
	OP23110	US	7	STATE	TX	04/10/1995					
	Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED										
	Notes: CLASS 1 MOD/ADDITION OF 12 WASTES										
	OP230OH	US	6	STATE	TX	12/13/1994					
	Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW										
	Notes: CLASS 1 MOD										
	OP23110	US	6	STATE	TX	12/13/1994					
	Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED										
	Notes: CLASS 1 MOD										
	OP240OH	US	6	STATE	TX	12/13/1994					
	Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW										
	Notes: CLASS 1 MOD										
OP242NS	US	6	STATE	TX	12/13/1994						
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT											
Notes: CLASS 1 MOD											
OP240OH	US	5	STATE	TX	10/21/1994						
Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW											
Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE											
OP242NS	US	5	STATE	TX	10/21/1994						
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT											
Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE											
OP230OH	US	5	STATE	TX	07/08/1994						
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW											
Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE											
OP23111	US	5	STATE	TX	07/08/1994						
Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED											
Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE											
OP240OH	US	4	STATE	TX	04/18/1994						
Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW											
Notes: CLASS 1 MOD											
OP242NS	US	4	STATE	TX	04/18/1994						
Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT											
Notes: CLASS 1 MOD											
OP230OH	US	4	STATE	TX	04/12/1994						
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW											
Notes: CLASS 1 MOD											
OP23110	US	4	STATE	TX	04/12/1994						
Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED											
Notes: CLASS 1 MOD											
OP230OH	US	1	STATE	TX	02/05/1993						
Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW											

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DISPOSAL PROPERTIES LLC - continued							TXD052649027		
Series Name		Seq.							
PERMIT		1							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date
CSA		Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New
				1	STATE				
		Notes: CLASS 1 MOD							
		OP23110	US	1	STATE	TX	02/05/1993		
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
		Notes: CLASS 1 MOD							
		OP2400H	US	1	STATE	TX	02/05/1993		
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
		Notes: CLASS 1 MOD							
		OP242NS	US	1	STATE	TX	02/05/1993		
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
		Notes: CLASS 1 MOD							
		OP2300H	US	2	STATE	TX	02/04/1993		
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW							
		Notes: CLASS 1 MOD							
		OP23110	US	2	STATE	TX	02/04/1993		
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
		Notes: CLASS 1 MOD							
		OP2400H	US	2	STATE	TX	02/04/1993		
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
		Notes: CLASS 1 MOD							
		OP242NS	US	2	STATE	TX	02/04/1993		
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
		Notes: CLASS 1 MOD							
		OP200PG	HQ	1	EPA	TX	07/16/1992		
		Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA							
		OP200PG	HQ	1	STATE	TX	07/06/1992		
		Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date
T54 & T82	3-1	TANK STORAGE				2	815.00	Gal	04/29/1988
		Interim Status - Operating, Actively Managing Rcra-regulated Waste							
		Notes: T54=165G, T82=650G							
		Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New
		OP485	TX	1	STATE	TX	06/10/1991		
		Description: FINAL DRAFT TO CHIEF CLERK							
		OP160	US	1	STATE	TX	06/04/1991		
		Description: PUBLIC NOTICE							
		OP484	TX	1	STATE	TX	09/25/1990		
		Description: DRAFT PERMIT DISTRIBUTION							
		OP150	US	1	STATE	TX	07/30/1989		
		Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE							
		OP020	US	1	STATE	TX	11/07/1988		
		Description: PART B RECEIVED							
		OP010	HQ	1	STATE	TX	04/29/1988		
		Description: PART B CALL-IN							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date
T54 & T82	3-2	TANK STORAGE				2	815.00	Gal	07/06/1992
		Permitted - Operating, Actively Managing Rcra-regulated Waste							
		Notes: T54=165G, T82=650G							
		Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New
		OP2400H	US	14	STATE	TX	05/11/1998		
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW							
		Notes: CLASS 1 MOD/TYPO ERRORS							
		OP242NS	US	14	STATE	TX	05/11/1998		
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT							
		Notes: CLASS 1 MOD/TYPO ERRORS							
		OP2300H	US	15	STATE	TX	03/20/1998		
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW							
		Notes: CLASS 1 MOD/TYPO ERRORS							
		OP23110	US	15	STATE	TX	03/20/1998		
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED							
		Notes: CLASS 1 MOD/TYPO ERRORS							
		OP2400H	US	13	STATE	TX	02/19/1998		

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Series Name		Seq.									
PERMIT		1									
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date		
T54 & T82		Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New		
				13	STATE						
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/NAME CHANGE									
		OP242NS	US	13	STATE	TX	02/19/1998				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT									
		Notes: CLASS 1 MOD/NAME CHANGE									
		OP240OH	US	12	STATE	TX	02/13/1998				
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP242NS	US	12	STATE	TX	02/13/1998				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP230OH	US	13	STATE	TX	01/16/1998				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP23110	US	13	STATE	TX	01/16/1998				
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP230OH	US	14	STATE	TX	07/28/1997				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/NAME CHANGE									
		OP23110	US	14	STATE	TX	07/28/1997				
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED									
		Notes: CLASS 1 MOD/NAME CHANGE									
		OP240OH	US	10	STATE	TX	03/20/1997				
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP242NS	US	10	STATE	TX	03/20/1997				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP230OH	US	11	STATE	TX	02/18/1997				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP23110	US	11	STATE	TX	02/18/1997				
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP240RW	US	3	STATE	TX	02/03/1997				
		Description: MODIFICATION DETERMINATION-REQUEST WITHDRAWN									
		Notes: CLASS 2 MOD REQUESTED 11/20/95 WITHDRAWN									
		OP242NS	US	3	STATE	TX	02/03/1997				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT									
		Notes: CLASS 2 MOD REQUESTED 11/20/95 WITHDRAWN									
		OP240OH	US	9	STATE	TX	10/29/1996				
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP242NS	US	9	STATE	TX	10/29/1996				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP230OH	US	10	STATE	TX	10/14/1996				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP23110	US	10	STATE	TX	10/14/1996				
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP240OH	US	8	STATE	TX	01/23/1996				
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP242NS	US	8	STATE	TX	01/23/1996				
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT									
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN									
		OP230OH	US	3	STATE	TX	11/20/1995				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 2 MOD									
		OP230OH	US	8	STATE	TX	11/20/1995				
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW									
		Notes: CLASS 2 MOD/CHANGE WAP									
		OP23120	US	3	STATE	TX	11/20/1995				
		Description: CLASS DETERMINATION-CLASS 2 MOD									

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DISPOSAL PROPERTIES LLC - continued										TXD052649027
Series Name		Seq.								
PERMIT		1								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date	
T54 & T82	Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig.	Sched. New		
			3	STATE						
		Notes: CLASS 2 MOD								
		OP23120	US	8	STATE	TX	11/20/1995			
		Description: CLASS DETERMINATION-CLASS 2 MOD								
		Notes: CLASS 2 MOD/CHANGE WAP								
		OP2300H	US	9	STATE	TX	10/31/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	9	STATE	TX	10/31/1995			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2400H	US	7	STATE	TX	06/22/1995			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP242NS	US	7	STATE	TX	06/22/1995			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP2300H	US	7	STATE	TX	04/10/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP23110	US	7	STATE	TX	04/10/1995			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP2300H	US	6	STATE	TX	12/13/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP23110	US	6	STATE	TX	12/13/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD								
		OP2400H	US	6	STATE	TX	12/13/1994			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP242NS	US	6	STATE	TX	12/13/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD								
		OP2400H	US	5	STATE	TX	10/21/1994			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP242NS	US	5	STATE	TX	10/21/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP2300H	US	5	STATE	TX	07/08/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP23111	US	5	STATE	TX	07/08/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP2400H	US	4	STATE	TX	04/18/1994			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP242NS	US	4	STATE	TX	04/18/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD								
		OP2300H	US	4	STATE	TX	04/12/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP23110	US	4	STATE	TX	04/12/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD								
		OP2300H	US	1	STATE	TX	02/05/1993			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP23110	US	1	STATE	TX	02/05/1993			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD								
		OP2400H	US	1	STATE	TX	02/05/1993			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								

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DISPOSAL PROPERTIES LLC - continued							TXD052649027	
Series Name	Seq.							
PERMIT	1							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T54 & T82		Event Owner Event Seq. Resp. Agcy Act. Loc. Actual Date Sched. Orig. Sched. New OP242NS US 1 STATE TX 02/05/1993 Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT Notes: CLASS 1 MOD OP230OH US 2 STATE TX 02/04/1993 Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW Notes: CLASS 1 MOD OP23110 US 2 STATE TX 02/04/1993 Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED Notes: CLASS 1 MOD OP240OH US 2 STATE TX 02/04/1993 Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW Notes: CLASS 1 MOD OP242NS US 2 STATE TX 02/04/1993 Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT Notes: CLASS 1 MOD OP200PG HQ 1 EPA TX 07/16/1992 Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA OP200PG HQ 1 STATE TX 07/06/1992 Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T54 & T82	3-3	TANK STORAGE Permitted - Inactive/closing, But Not Yet Rcra Closed Notes: T54=165G & T82=650G	2	815.00	Gal	01/01/1998		
		Event Owner Event Seq. Resp. Agcy Act. Loc. Actual Date Sched. Orig. Sched. New OP240OH US 16 STATE TX 02/15/1999 Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN OP242NS US 16 STATE TX 02/15/1999 Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN OP230OH US 17 STATE TX 12/14/1998 Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW Notes: CLASS 1ED MOD/REVISE CLOSURE PLAN OP23111 US 17 STATE TX 12/14/1998 Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED Notes: CLASS 1ED/REVISE CLOSURE PLAN						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
TREAT TANKS	4-1	TANK TREATMENT Interim Status - Operating, Actively Managing Rcra-regulated Waste Notes: T2-T3=19774GEACH,T4-T6=10132GEACH,T7-T10=3856GEACH,T11=8813G,T12=24000G T13-T15=7000GEACH,T27-T28=19774GEACH	16	178,699.00	Gal/Day	04/29/1988		
		Event Owner Event Seq. Resp. Agcy Act. Loc. Actual Date Sched. Orig. Sched. New OP485 TX 1 STATE TX 06/10/1991 Description: FINAL DRAFT TO CHIEF CLERK OP160 US 1 STATE TX 06/04/1991 Description: PUBLIC NOTICE OP484 TX 1 STATE TX 09/25/1990 Description: DRAFT PERMIT DISTRIBUTION OP150 US 1 STATE TX 07/30/1989 Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE OP020 US 1 STATE TX 11/07/1988 Description: PART B RECEIVED OP010 HQ 1 STATE TX 04/29/1988 Description: PART B CALL-IN						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
TREAT TANKS	4-2	TANK TREATMENT Permitted - Operating, Actively Managing Rcra-regulated Waste Notes: T2-T3=19774GEACH,T4-T6=10132GEACH,T7-T10=3856GEACH,T11=8813G,T12=24000G T13-T15=7000GEACH,T27-T28=19774GEACH	16	178,699.00	Gal/Day	07/06/1992		

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DISPOSAL PROPERTIES LLC - continued										TXD052649027
Series Name		Seq.								
PERMIT		1								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes				# Units	Capacity	UOM	Effective Date	
TREAT TANKS		Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
				15	STATE					
		Notes: CLASS 1 MOD/TYPO ERRORS								
		OP23110	US	15	STATE	TX	03/20/1998			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/TYPO ERRORS								
		OP2400H	US	13	STATE	TX	02/19/1998			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP242NS	US	13	STATE	TX	02/19/1998			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP2400H	US	12	STATE	TX	02/13/1998			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	12	STATE	TX	02/13/1998			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2300H	US	13	STATE	TX	01/16/1998			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	13	STATE	TX	01/16/1998			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2300H	US	14	STATE	TX	07/28/1997			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP23110	US	14	STATE	TX	07/28/1997			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/NAME CHANGE								
		OP2400H	US	10	STATE	TX	03/20/1997			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	10	STATE	TX	03/20/1997			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2300H	US	11	STATE	TX	02/18/1997			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	11	STATE	TX	02/18/1997			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP240RW	US	3	STATE	TX	02/03/1997			
		Description: MODIFICATION DETERMINATION-REQUEST WITHDRAWN								
		Notes: CLASS 2 MOD REQUESTED 11/20/95 WITHDRAWN								
		OP242NS	US	3	STATE	TX	02/03/1997			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 2 MOD REQUESTED 11/20/95 WITHDRAWN								
		OP2400H	US	9	STATE	TX	10/29/1996			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	9	STATE	TX	10/29/1996			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2300H	US	10	STATE	TX	10/14/1996			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	10	STATE	TX	10/14/1996			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2400H	US	8	STATE	TX	01/23/1996			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP242NS	US	8	STATE	TX	01/23/1996			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2300H	US	3	STATE	TX	11/20/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 2 MOD								

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DISPOSAL PROPERTIES LLC - continued										TXD052649027
Series Name	Seq.									
PERMIT	1									
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date				
TREAT TANKS		Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
		OP2300H	US	8	STATE	TX	11/20/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 2 MOD/CHANGE WAP								
		OP23120	US	3	STATE	TX	11/20/1995			
		Description: CLASS DETERMINATION-CLASS 2 MOD								
		Notes: CLASS 2 MOD								
		OP23120	US	8	STATE	TX	11/20/1995			
		Description: CLASS DETERMINATION-CLASS 2 MOD								
		Notes: CLASS 2 MOD/CHANGE WAP								
		OP2300H	US	9	STATE	TX	10/31/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP23110	US	9	STATE	TX	10/31/1995			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN								
		OP2400H	US	7	STATE	TX	06/22/1995			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP242NS	US	7	STATE	TX	06/22/1995			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP2300H	US	7	STATE	TX	04/10/1995			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP23110	US	7	STATE	TX	04/10/1995			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD/ADDITION OF 12 WASTES								
		OP2300H	US	6	STATE	TX	12/13/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP23110	US	6	STATE	TX	12/13/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD								
		OP2400H	US	6	STATE	TX	12/13/1994			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP242NS	US	6	STATE	TX	12/13/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD								
		OP2400H	US	5	STATE	TX	10/21/1994			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP242NS	US	5	STATE	TX	10/21/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP2300H	US	5	STATE	TX	07/08/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP23111	US	5	STATE	TX	07/08/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD, PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1ED MOD/ADD HOUSEHOLD HAZARDOUS WASTE								
		OP2400H	US	4	STATE	TX	04/18/1994			
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP242NS	US	4	STATE	TX	04/18/1994			
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT								
		Notes: CLASS 1 MOD								
		OP2300H	US	4	STATE	TX	04/12/1994			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP23110	US	4	STATE	TX	04/12/1994			
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED								
		Notes: CLASS 1 MOD								
		OP2300H	US	1	STATE	TX	02/05/1993			
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW								
		Notes: CLASS 1 MOD								
		OP23110	US	1	STATE	TX	02/05/1993			
		Description: CLASS DETERMINATION-								

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DISPOSAL PROPERTIES LLC - continued							TXD052649027	
Series Name		Seq.						
PERMIT		1						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes			# Units	Capacity	UOM	Effective Date
TREAT TANKS		Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig. Sched. New
				1	STATE			
		Notes: CLASS 1 MOD						
		OP240OH	US	1	STATE	TX	02/05/1993	
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW						
		Notes: CLASS 1 MOD						
		OP242NS	US	1	STATE	TX	02/05/1993	
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT						
		Notes: CLASS 1 MOD						
		OP230OH	US	2	STATE	TX	02/04/1993	
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW						
		Notes: CLASS 1 MOD						
		OP23110	US	2	STATE	TX	02/04/1993	
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED						
		Notes: CLASS 1 MOD						
		OP240OH	US	2	STATE	TX	02/04/1993	
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW						
		Notes: CLASS 1 MOD						
		OP242NS	US	2	STATE	TX	02/04/1993	
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT						
		Notes: CLASS 1 MOD						
		OP200PG	HQ	1	EPA	TX	07/16/1992	
		Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA						
		OP200PG	HQ	1	STATE	TX	07/06/1992	
		Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes			# Units	Capacity	UOM	Effective Date
T1	6-1	TANK TREATMENT			1	19,774.00	Gal/Day	04/29/1988
		Interim Status - Operating, Actively Managing Rcra-regulated Waste						
		Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig. Sched. New
		OP485	TX	1	STATE	TX	06/10/1991	
		Description: FINAL DRAFT TO CHIEF CLERK						
		OP160	US	1	STATE	TX	06/04/1991	
		Description: PUBLIC NOTICE						
		OP484	TX	1	STATE	TX	09/25/1990	
		Description: DRAFT PERMIT DISTRIBUTION						
		OP150	US	1	STATE	TX	07/30/1989	
		Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE						
		OP020	US	1	STATE	TX	11/07/1988	
		Description: PART B RECEIVED						
		OP010	HQ	1	STATE	TX	04/29/1988	
		Description: PART B CALL-IN						
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes			# Units	Capacity	UOM	Effective Date
T1	6-2	TANK TREATMENT			1	19,774.00	Gal/Day	07/06/1992
		Permitted - Operating, Actively Managing Rcra-regulated Waste						
		Event	Owner	Event Seq.	Resp. Agcy	Act.Loc.	Actual Date	Sched. Orig. Sched. New
		OP270	HQ	1	STATE	TX		07/16/2002
		Description: PERMIT EXPIRES						
		OP240OH	US	20	STATE	TX	12/09/1999	
		Description: MODIFICATION DETERMINATION-MOD. OTHER THAN AC, CA, OR GW						
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN						
		OP242NS	US	20	STATE	TX	12/09/1999	
		Description: SIGNIFICANCE DETERMINATION-NOT SIGNIFICANT						
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN						
		OP230OH	US	21	STATE	TX	11/11/1999	
		Description: MODIFICATION REQUESTED-MOD. OTHER THAN AC, CA, OR GW						
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN						
		OP23110	US	21	STATE	TX	11/11/1999	
		Description: CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED						
		Notes: CLASS 1 MOD/UPDATE CONTINGENCY PLAN						
		OP200PG	HQ	1	STATE	TX	07/06/1992	
		Description: FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA						

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DISPOSAL PROPERTIES LLC - continued							TXD052649027	
Series Name	Seq.							
RENEWAL	7							
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
CSA	2-2	CONTAINER Permitted - Operating, Actively Managing Rcra-regulated Waste	1	60,940.00	Gal	07/06/1992		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
PC270	US	1	STATE	TX		03/18/2014		
Description: PERMIT EXPIRES								
OP200PI	HQ	1	STATE	TX	03/18/2004			
Description: FINAL DETERMINATION-RCRA PERMIT ISSUED, HSWA NOT APPLIC.								
OP160	US	1	STATE	TX	06/23/2003			
Description: PUBLIC NOTICE								
OP485	TX	1	STATE	TX	06/16/2003			
Description: FINAL DRAFT TO CHIEF CLERK								
OP484	TX	1	STATE	TX	02/27/2003			
Description: DRAFT PERMIT DISTRIBUTION								
OP150	US	1	STATE	TX	02/21/2002			
Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE								
OP020	US	1	STATE	TX	12/28/2001			
Description: PART B RECEIVED								
Unit Name	Seq.	Process Code / Legal and Operating Status / Notes	# Units	Capacity	UOM	Effective Date		
T1	6-2	TANK TREATMENT Permitted - Operating, Actively Managing Rcra-regulated Waste	1	19,774.00	Gal/Day	07/06/1992		
Event	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	
PC270	US	1	STATE	TX		03/18/2014		
Description: PERMIT EXPIRES								
OP200PI	HQ	1	STATE	TX	03/18/2004			
Description: FINAL DETERMINATION-RCRA PERMIT ISSUED, HSWA NOT APPLIC.								
OP160	US	1	STATE	TX	06/23/2003			
Description: PUBLIC NOTICE								
OP485	TX	1	STATE	TX	06/16/2003			
Description: FINAL DRAFT TO CHIEF CLERK								
OP484	TX	1	STATE	TX	02/27/2003			
Description: DRAFT PERMIT DISTRIBUTION								
OP150	US	1	STATE	TX	02/21/2002			
Description: DETERMINED TO BE COMPLETE/TECH ADEQUATE								
OP020	US	1	STATE	TX	12/28/2001			
Description: PART B RECEIVED								
Unlinked Units and Seq. No.								
Unlinked Events	Owner	Event Seq.	Resp. Agcy	Act. Loc.	Actual Date	Sched. Orig.	Sched. New	

* End of Report *